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OF ECONOMICS AND
POLITICAL SCIENCE ■

Sustainability Impact Assessment in Support of Negotiations with Partner Countries in Eastern and Southern Africa in view of Deepening the Existing Interim Economic Partnership Agreement

Ex-post Evaluation • May 2021



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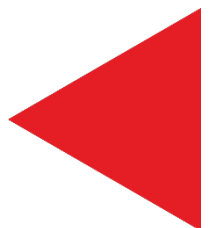


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Abbreviations

AfCFTA	African Continental Free Trade Area
AFRODAD	African Forum and Network on Debt and Development
AITF	African Infrastructure Trust Fund
ACP	African-Caribbean-Pacific
ACA	Agreement on administrative cooperation
AGOA	African Growth Opportunity
CEACR	Committee of Experts on the Application of Conventions (ILO)
COMESA	Common Market for Eastern and Southern Africa
CGE	Computable general equilibrium
CBD	Convention on Biological Diversity
CITES	Convention on International Trade in Endangered Species
CSO	Civil Society Organisations
CSR	Corporate Social Responsibility
CPA	Cotonou Partnership Agreement
CTF	Customer and Trade Facilitation
CwA	Compact with Africa
DEVCO	Directorate-General for International Cooperation and Development
DG Trade	Directorate-General for Trade
EALA	East Africa legislative Assembly
EAC	Eastern African Community
EDF	European Development Fund
ESA	Eastern and Southern Africa
EPA	Economic Partnership Agreement
ECDD	Engagement Communautaire pour le Développement Durable
EC	European Commission
EEAS	European External Action Service
EEZ	Exclusive Economic Zones
EIB	European Investment Bank
EP/INTA	European Parliament Committee on International Trade
EBA	Everything-but-Arms
ESA4	Four ESA countries (ESA5 except for Comoros)
ESA5	Five ESA countries
EU	European Union
EUD	EU Delegation
FAO	Food and Agriculture Organisation
FATF	Financial Action Task Force
FDI	Foreign Direct Investment
FTA	Free Trade Agreement
GATT	General Agreement on Tariffs and Trade
GDP	Gross Domestic Product
GDPR	General Data Protection Regulation
GSP	Generalised System of Preference
GI	Geographical Indications

GTAP	Global Trade Analysis Project
GHG	Green House Gas
HDI	Human Development Index
HHI	Herfindahl-Hirschman Index
IUU	Illegal, unreported and unregulated fishing
IOC	Indian Ocean Commission
IOT	Indian Ocean Tuna Commission
IPR	Intellectual Property Rights
ILO	International Labour Organisation
INRAPE	National Institute of Research in Agriculture and Fisheries
ITC	International Trade Centre
IL	Intervention Logic
IMF	International Monetary Fund
JP	Joint Programming
LDC	Least Developed Country
LSE	London School of Economics and Political Science
MDA	Ministries, Departments and Agencies
MOSC	Maison des Organisations de la Société Civile
MSME	Micro, Small & Medium Enterprises
MFN	Most Favoured Nation
NAO	National Authorising Officer
NEPAC	National EPA Committee
NGO	Non-Governmental Organisation
NIP	National Indicative Plan
NTB	Non-tariff barriers
NTM	Non-tariff measures
OACPS	The Organisation of African, Caribbean and Pacific States
OECD	Organisation for Economic Co-operation and Development
ORs	EU's outermost regions
OCT	Overseas countries and territories
PACJA	Pan African Climate Justice Alliance
PE	Partial Equilibrium
PPPs	Public-private Partnerships
PPP	Purchasing Power Parity
PSR	Product-Specific Rules
PUR	Preference Utilisation Rate
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals
RECs	Regional Economic Communities
REX	Registered Exporter System
ROSA	Rules of Origin Self-Assessment
RBC	Responsible business conduct
RISM	Regional Integration Support Mechanism
RISP	Regional Integration Support Program
ROM	Result Oriented Monitoring
RoO	Rules of origin

SEATINI	The Southern and Eastern Africa Trade Information and Negotiations Institute
SIDS	Small Island Developing States
SPS	Sanitary and phytosanitary measures
SME	Small and Medium Size Enterprise
SAPSN	Southern Africa People's Solidarity Network
SADC	Southern African Development Community
SFPA	Sustainable Fisheries Partnership Agreement
SITC	Standard International Trade Classification
SOE	State-owned enterprises
SIA	Sustainability Impact Assessment
SDG	Sustainable Development Goals
SDT	Special and Differential Treatment
SFPA	Sustainable Fishery Partnership Agreement
SME	Small and Medium-sized Enterprises
TACB	Technical Assistance and Capacity Building Programmes
TARIC	Integrated Tariff of the European Union
TAXUD	Taxation and Customs
TBT	Technical Barriers to Trade
TCF	Technical Cooperation Facility
TSD	Trade and Sustainable Development
TFA	Trade Facilitation Agreement
TOR	Terms of Reference
UNFCCC	UN Framework Convention on Climate Change
UK	United Kingdom
UN	United Nations
UNCTAD	United Nations Conference on Trade and Development
WEO	World Economic Outlook
WITS	World Integrated Trade Solution
WTO	World Trade Organisation

Executive Summary

In 2007, six countries of the Eastern and Southern Africa (ESA) region¹ (Comoros, Madagascar, Mauritius, Seychelles, Zambia and Zimbabwe) concluded an interim Economic Partnership Agreement (EPA) with the EU. In 2009, four countries (Madagascar, Mauritius, Seychelles and Zimbabwe) (ESA4) signed the agreement, which has been provisionally applied for these countries since 14 May 2012. Mauritius and Seychelles started liberalising tariffs on the European Union (EU) imports in 2013 and Madagascar and Zimbabwe started liberalising in 2016 and 2017 respectively. The EPA foresees consecutive rounds of liberalisation over 10 years and the tariff liberalisation process should conclude in 2022. Comoros signed the agreement in July 2017 and ratified it in January 2019, with entry into force in February 2019. Comoros is, therefore, part of the negotiations to deepen the Agreement.

The interim EPA between the EU and the five ESA partners (ESA5) includes the following chapters: Abolition of EU duties and quotas for imports from these countries; gradually opening EU exports to these countries; a protocol on rules of origin (RoO); provisions on fisheries and trade defence; commitments to cooperate on technical barriers to trade, and standards on animal and plant health; rules and commitments on development cooperation; and mechanism for settling disputes.

The interim EPA has several distinct objectives. First, it aims at the reduction and eventual eradication of poverty. It second shall promote regional integration within the ESA region and shall third promote the gradual integration of the ESA region into the world economy. Fourth, the agreement aims to support structural adjustment in the ESA region. Further objectives are to improve the trade capacity and the regulatory framework for trade and investment in the ESA region. Finally, the agreement aims at strengthening the relations between the partners.

Implementation and Awareness of the interim EPA

Almost all exports of originating goods from Madagascar and Mauritius enter the EU market free of duty and about 97 per cent of originating goods from Seychelles and 96 per cent of Zimbabwe's originating exports enter the EU market free of duties. The preference utilisation rates (PUR) for EU goods entering the markets of Madagascar, Mauritius, Seychelles and Zimbabwe are currently rather low, i.e. between 0 and 63 per cent, with a weighted average of below 10 per cent (See Annex VII: Appendix 1-6).

The stakeholder consultation shows that civil society in Madagascar and Seychelles has low levels of awareness of the interim EPA whereas in Mauritius and Zimbabwe it has high levels of awareness. Civil Society Organisations (CSO) who have higher than average levels of awareness displayed the following characteristics: (1) they work on socio-economic development issues, (2) they were members of Civil Society networks who have played a critical role in raising awareness and building the capacity of their members in research and advocacy on trade and trade-related policies and negotiations, and (3) They are networked with relevant Government Ministries, Departments and Agencies.

RoO

The overall framework governing RoO is based on product-specific rules of origin (PSR), these being wholly obtained rules, an *ad valorem* percentage rule, based on maximum amounts of non-originating materials,

¹ ESA is a diverse EPA group including Indian Ocean islands (Comoros, Madagascar, Mauritius and Seychelles), countries of the Horn of Africa (Djibouti, Ethiopia, Eritrea and Sudan) and some countries of Southern Africa (Malawi, Zambia and Zimbabwe).

change of tariff classification rules and specific working or processing requirements. The ESA4 countries make significant use of the EPA preferences made available to them by the EU. The PUR are close to 100 per cent.

Several challenges remain to be addressed for RoO to further benefit the majority of ESA5 stakeholders: further simplification of RoOs, measures for capacity building in RoOs for the private sector, closer alignment of the development and trade components of the EPA; and involvement of the private sector and potential new investors in trade negotiations, to the extent possible.

Analysis of Trade Flows

The analysis of trade flows the authors of this study have conducted accounts for the fact that individual partner countries' tariff liberalisation processes started at different points in time. Mauritius and Seychelles started liberalising in 2013, and Madagascar and Zimbabwe in 2016 and 2017 respectively.

ESA4 countries' goods exports to the EU followed different trends in the period 2009 to 2019 including the period that followed 2012. Exports from Madagascar to the EU show an upward trend following the year 2012. Goods exports from Seychelles remained relatively stable, while exports from Mauritius and Zimbabwe slightly declined. ESA4 countries' goods imports from the EU follow different trends for the period 2009 to 2019. Diverging trends also emerge for the period that followed the elimination of import tariffs by ESA4 countries. Total EU goods exports to Madagascar and Mauritius significantly increased after the beginning of the tariff liberalisation process. Total EU goods exports to the Seychelles and Zimbabwe remained largely unchanged after 2013 and 2017 respectively.

EU27-ESA4 investment stocks have increased significantly. In 2018, stocks of EU foreign direct investment (FDI) in ESA4 countries amounted to a total of 17.1 billion EUR (as compared to 13.1 billion EUR in 2014). Individually, Mauritius accounted for by far the largest part with 15.7 billion EUR alone. Seychelles' part amounted to 778 million EUR, while the respective figures were 366 million EUR for Zimbabwe and 268 million EUR for Madagascar. ESA4 FDI stocks in the EU amounted to 10.3 million EUR in 2018. This also constitutes a significant increase compared to 2014 when FDI stocks amounted to 6.3 million EUR only.

Economic Impacts

The European Commission's Directorate-General (DG) Trade undertook a set of modelling exercises based on a computable general equilibrium (CGE) model (for Madagascar, Mauritius and Zimbabwe) and a partial equilibrium (PE) model (for Seychelles; due to data limitations).

Both models indicate that ESA4 countries benefit from the EPA with the EU in terms of higher trade volumes. Increased specialisation and improvements in the international division of labour cause a reallocation of domestic productive resources (labour and capital) to more productive uses, which causes domestic production to rise in ESA4 countries, reflected by increases in these countries' real gross domestic product (GDP) (with EU GDP remaining largely unchanged). With an EPA, EU total exports to Madagascar, Mauritius and Zimbabwe are estimated to be 30% higher, 32% higher and 8% higher respectively. The PE model results indicate that the EPA contributes to rising EU exports to Seychelles. Madagascar's exports to the EU would largely remain unchanged in absence of the EPA. Total EU imports from Madagascar are estimated to be 2% higher with the EPA. By contrast, EU imports from Mauritius are estimated to be 93% higher and imports from Zimbabwe are estimated to be 18% higher with an EPA in place.

In addition, the interim EPA has had limited impacts on the EU's outermost regions and overseas countries and territories, especially those in proximity to ESA4 countries, in different ways. As concerns trade diversion at the expense of least developed countries (LDCs), goods and services exports to the EU are hardly affected by the EPA; we looked specifically at Mayotte and La Réunion.

These numbers are generally mirrored by the estimates computed for the countries' overall economic activity (economic output, GDP). Importantly, no ESA5 country experiences a reduction in aggregate economic output, which indicates that the EPA with the EU contributes to growth in ESA countries overall economic activity. Due to its economic size, for the EU the impact of the EPA on overall economic output is overall negligible (but positive). The impacts of the interim EPA on wages are generally negligible, except for Mauritius.

Empirical EU-ESA4 trade data suggest that after the implementation of the interim EPA specialisation increased for commodities in which ESA4 countries have an international competitive advantage. This can also be observed for ESA4 goods exports to regional trade blocs such as notably Southern African Development Community (SADC) and Common Market for Eastern and Southern Africa (COMESA).

Social, Gender, Human Rights and Environmental Impacts of the Interim EPA

The review of the evidence gathered so far indicates that the interim EPA overall has not had major impacts on environmental, social conditions, gender and human rights conditions in ESA5 countries. Concerning environmental impacts related to the interim EPA, these mainly appear linked to the scale of EU exports. Major structural effects linked to a potential diversification of exports have not been identified.

The review of major exporting sectors has identified important ongoing environmental, social, gender and human rights concerns. These include concerns over social conditions in agricultural sectors with major exports to the EU. Low salaries and instances of child labour are not specifically a result of trade with the EU but these issues are a concern for sectors exporting to the EU. Concerns over labour conditions have been raised in manufacturing, in which women appear to be more adversely affected. Increased production can also increase water consumption and water pollution. In Madagascar and Zimbabwe, there are strong social, human rights and environmental concerns linked to mining.

The ESA5 countries have made some policy and institutional reforms: while progress and actions have varied, there have been improvements in governance. The EU has provided support in several areas through its development cooperation, though strong links between national reforms, EU development cooperation, the Agreement itself and environmental, social and human rights conditions were unsurprisingly not found. In sum, social, gender and human rights concerns in these sectors have continued during the implementation of the interim EPA, indicating key areas where further policy action is needed.

Development cooperation

To specify and operationalize the general objectives of the interim EPA, the EPA includes multiple references to cooperation and development assistance. The partners have also developed a toolkit labelled Development Matrix to define key areas, objectives and illustrative activities. The development assistance to ESA5 nations was designed to help implement the interim EPA takes place mainly within the framework of the European Development Fund (EDF). The two relevant EDFs to be considered for the evaluation within the EU-ESA interim EPA are the 10th programme (lasting from 2008-2013, and the 11th EDF (2014-2020). The EU is supporting the ESA5-countries in the framework of different bilateral and other programmes, mostly organized in regional clusters, mirroring the Regional Economic Communities (RECs). Finally, each of the ESA5 countries received a grant of 10 million EUR (Comoros: 6 million EUR) for the implementation of the EPA in 2020.

The European Commission introduced criteria for an assessment of the individual programmes' impact on ESA5 countries. Among them, relevance, effectiveness, efficiency and influence concerning governance are central. Although it is not trivial to exactly assess the effectiveness and, therefore, judge the overall impact of the EU's development assistance to ESA5 countries in the process of implementation of the

EU-ESA5 interim EPA, it can generally be seen as positive. According to the existing evaluations, the different projects and programmes have increased the ability of ESA5 countries to make use of the interim EPA. Problems include the lack of ownership and governance issues on the side of the ESA5 governments and a deficit in the targeting of the measures on the EU's side. Mauritius seems to be an exception that made very good use of the support.

Conclusion

The ex-post evaluation shows that – despite the difficulties to establish robust causal empirical relations – the interim EPA has helped to meet its objectives, albeit rather slowly and dependent on the EU partner countries' efforts. Poverty reduction still needs time; before the Covid 19 pandemic, progress could be observed. The promotion of regional integration within the ESA region and with the EU has intensified. However, the gradual integration of the ESA region into the world economy cannot be directly traced back to interim EPA. Trade capacity and the regulatory framework for trade and investment in the ESA region could be partly enhanced. The awareness in the civil society and business communities could be raised. There are still open questions, which concern foremost sustainability issues and governance problems in ESA5 countries.

1. Introduction and Methodology

1.1 Objective of the study and ex-post report

The objective of the Sustainability Impact Assessment is to estimate possible impacts of a deepening of the EPA between the EU and the ESA5 countries. However, to be able to assess future impacts of further liberalisation, it is likewise necessary to understand the impacts thus far. Therefore, the scope of this study includes a mini ex-post evaluation of the EPA to review impacts across all areas of the Agreement (EU Member states as well as the ESA5 countries, including where possible data in Comoros), which are inter-related and crucial for understanding the economic, human rights, social aspects, environmental (including climate), and development cooperation impacts of the current agreement by way of secondary and primary data collection and analysis. The Ex-post Evaluation Report is structured as follows: after this brief introduction, we assess the implementation of the EPA (Task 6); RoO (Task 7); analysis of trade and investment flows (Task 8); economic, social, human rights and environmental impact of the EPA (Task 9, which we have split into two chapters); horizontal effects on governance and the business environment (Task 9); development cooperation (Task 10) and conclusions (Task 11). We also enclose several annexes, which provide more granular information for each subject.

1.2 Introduction to the existing EPA between the EU and ESA

In 2007, six countries of the ESA region² (Comoros, Madagascar, Mauritius, Seychelles, Zambia and Zimbabwe) concluded an interim EPA with the EU. In 2009, four countries (Madagascar, Mauritius, Seychelles and Zimbabwe) signed the agreement, which has been provisionally applied for these countries since 14 May 2012. Mauritius and Seychelles started liberalising tariffs on EU imports in 2013 and Madagascar and Zimbabwe started liberalising in 2016 and 2017 respectively. The EPA foresees consecutive rounds of liberalisation over 10 years. In principle, the tariff liberalisation process should conclude in 2022. Comoros signed the agreement in July 2017 and ratified it in January 2019, with entry into force in February 2019. Comoros now forms part of the negotiations to deepen the Agreement. The interim EPA between the EU

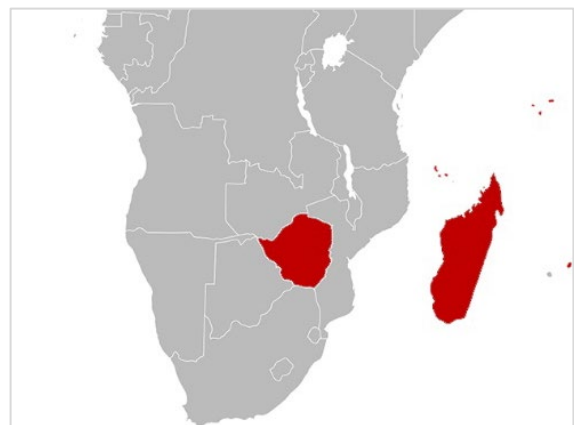


Figure 1: Map of ESA5 countries

Source: European Commission, 2020

and the ESA5 countries includes the following chapters: Abolition of EU duties and quotas for imports from these countries; gradually opening up EU exports to these countries; a protocol on RoOs; provisions on fisheries and trade defence; commitments to cooperate on technical barriers to trade, and standards on animal and plant health; rules and commitments on development cooperation; and mechanism for settling disputes.

1.3 Approach to ex-post evaluation

The ex-post evaluation provides answers to the following evaluation questions:

- a) *To what extent have the objectives of the existing interim EPA been achieved?*
- b) *Which sectors, activities, groups or countries in ESA4 have benefited most as a result of the EPA and which ones have incurred losses due to the EPA? (related to task 11)*

² ESA is a diverse EPA group including Indian Ocean islands (Comoros, Madagascar, Mauritius and Seychelles), countries of the Horn of Africa (Djibouti, Ethiopia, Eritrea and Sudan) and some countries of Southern Africa (Malawi, Zambia and Zimbabwe).

- c) *Has the EPA with ESA4 given rise to unintended consequences? (related to task 11)*
- d) *What are the shortcomings of the existing EPA that need to be addressed in the deepening negotiations?*
- e) *What good practices and lessons learned on EPA implementation on both the ESA4 and the EU side?*

In addition, the ex-post evaluation establishes the baseline for the following SIA, as it assesses the agreement to date, and analyses qualitatively and quantitatively the main impacts:

- **Economic impacts:** development of bilateral and overall trade between the EU and ESA4, impact on economic growth, economic diversification and poverty reduction, fostering of foreign investment, fiscal effects (budgetary effects, reduction of dependence on tariff revenues and revenue diversification);
- **Social impacts** (disaggregated by gender, when possible): job creation, level of employment, wages, inequality, winners and losers, poverty reduction, labour rights, labour standards, working conditions, impacts on women and vulnerable groups, effects on respect of basic human rights;
- **Gender impacts:** effects on women's economic empowerment, employment and welfare, gender equality;
- **Impacts on environment and climate:** impacts on greenhouse emissions, air quality, land use, energy efficiency, forestry, biodiversity, water protection, etc, as well as animal welfare;
- **Impacts on governance and business environment:** overall impacts on aspects of governance and business environment;
- **Impacts on consumers:** effects on consumer prices and safety in ESA4, effects on product variety and product quality;
- **Effects on regional integration and third parties:** effects on regional integration in the ESA region, under e.g. COMESA, SADC or African Continental Free Trade Area (AfCFTA), effects on EU's outermost regions and Least Developed Countries.

To assess the economic impact of the Agreement, the study will rely (partly) on economic modelling in the form of General and Partial Equilibrium Analysis:

In addition to the other tools outlined in Annex III, the analysis is based on a set of modelling exercises which the European Commission's DG Trade undertook – based on a CGE model (for Madagascar, Mauritius and Zimbabwe) and a PE model (for Seychelles; due to data limitations). The models applied account for the dismantling of tariffs for the EU's ESA partner countries. The CGE model output includes changes in trade flows and domestic output for various product groups and services sectors, changes in aggregate GDP as well as the relative impact on welfare, prices and wages at the macroeconomic level. The PE model output does not include macroeconomic effects, i.e. it does not provide estimates for GDP, wages and the aggregate price level. The modelling provides estimates for the impact of the EPA on trade flows and other economic variables against the counterfactual of not having an agreement in place. The baseline underlying the counterfactual includes most favoured nation (MFN) tariffs on the side of ESA countries and Generalised System of Preference (GSP), EBA or MFN tariffs on the EU side.³ The following descriptions of the models' calibration are based on DG Trade's internal analysis.

³ MFN tariffs depend on development level of each of the countries.

2. Implementation of the EPA

2.1 Interim EPA: principles of the Agreement

The principles of the Agreement, which constitute the basis for further negotiations between the Parties to reach a comprehensive EPA, are outlined in Article 4 of the interim Agreement legal text and include the following principles:

2.1.1 Building on the *acquis* of the Cotonou Agreement

The Cotonou Partnership Agreement (CPA) is a comprehensive agreement between the EU and the African, Caribbean and Pacific (ACP) countries, signed in Cotonou on 23 June 2000. EPAs build on the *acquis* of the development cooperation, economic and trade cooperation, and political dimension of the CPA.

Under the development cooperation pillar of the interim EPA, through the EDF, €10 million in project financing to each of the ESA5 countries, to assist with the implementation of the interim EPA. These resources have been used to improve and strengthen trade facilitation measures and instruments in general, such as the National Economic Licensing System in Mauritius and the project that aims to boost Seychelles' exports by encouraging economic diversification, production of higher value products and exploitation of niche markets.

The EU, through the EDF, has also financed aid-for-trade projects and programmes in the ESA5 countries that are not directly dedicated to taking advantage of the EPA.⁴

Negotiations of the EPA have strengthened the dialogue between the ESA5 and the EU and are viewed, in general, by the ESA5 countries as strengthening economic and trade cooperation between them and the EU. **There has been no political dialogue under the auspices of the interim EPA** although there has been political dialogue between the individual ESA5 countries and through SADC under the CPA.

Box 1: The Cotonou Agreement

The CPA was adopted in 2000, to be in place for 20 years, and replaced the 1975 Lomé Convention. It is based on three pillars:

- development cooperation
- economic and trade cooperation
- political dimension

The CPA was due to expire in February 2020 but has been extended, by mutual agreement, until 30 November 2021, unless the new partnership agreement between the EU and the ACP countries is provisionally applied or enters into force before that date.

The EU and the Organisation of African, Caribbean and Pacific States (OACPS) reached a political deal on a new agreement that succeeds the Cotonou Partnership Agreement on 3rd December 2020. The new “post-Cotonou” agreement, which was initialised on 15th April 2021, covers the following priority areas:

- democracy and human rights
- sustainable economic growth and development
- climate change
- human and social development
- peace and security
- migration and mobility

The agreement will include a common foundation at ACP level combined with three regional protocols for Africa, the Caribbean and the Pacific with a focus on the regions' specific needs.

⁴ See Chapter 8 in this Report.

2.1.2 Strengthening regional integration in the ESA region

EPAs have, as one of their pillars, economic and trade cooperation. In terms of trade cooperation, the CPA, with its non-reciprocal market access arrangements, are being replaced with regional EPAs, with reciprocal market access arrangements as stipulated under Article XXIV of the General Agreement on Tariffs and Trade (GATT) 1994.

The underlying theory behind the economic and trade pillar is that implementing a rules-based, predictable, free trade agreement between the Parties of the EU-ESA EPA would be one of several factors to attract direct investment into the productive sectors of the EPA countries, with these investors keen to take advantage of the preferential market access being offered under the EPA. Although there has been direct investment into the productive economies of the ESA countries, and although trade between the ESA5 and the EU has increased, the levels of direct investment, and the levels of increased trade, has not been significant enough to have a marked impact on poverty reduction or job creation. It should be recognised that implementation of the tariff reduction schedule is still ongoing, so the full effects of the market access component of the EPA are yet to be realised. However, this notwithstanding, there have been challenges and shortfalls in the implementation of the interim EPA that have started to be addressed under the interim EPA or will be addressed in the implementation of the full EPA.

One specific challenge faced by the ESA countries is whether they can use EPAs to deepen regional integration or whether EPAs will further complicate the regional trading arrangements already in place. Comoros, Madagascar, Mauritius, Seychelles, and Zimbabwe are all members of the COMESA and SADC and are also signatories to the AfCFTA. **The ESA5 countries, therefore, already belong to two overlapping regional trade agreements and an overlapping continental free trade agreement, each with different modalities and procedures.** This complicates trading arrangements for ESA importers and exporters. For example, in any preferential trade agreement, RoO need to be in place to avoid, as much as possible, trade diversion and trade deflection. The challenge, therefore, is not that there are RoO in place, but that ESA5 traders will need to familiarise themselves with four different RoO (COMESA, SADC, AfCFTA and EU-ESA EPA) if they are to take advantages of preferences offered. RoO are not always easy to understand, and sometimes difficult to comply with (see the Chapter on RoO for a detailed discussion on the implementation of RoO). If the ESA5 traders do not understand how to comply with the RoO, or the cost of compliance is considered greater than the MFN tariff, then traders will opt to trade with other COMESA, SADC, African and EU countries under MFN conditions.

The interim EPA has assisted with regional integration in that it has:

- **provided the possibility for cumulation⁵** both with other ESA states and, with other ESA states and with other ACP countries party to regional agreements, such as COMESA and SADC countries or other ACP countries.
- **allowed ESA States to maintain regional preferences** among themselves and with other African countries and regions without the obligation to extend them to the EU. This is an extremely important provision, especially in the context of the AfCFTA and the COMESA and SADC FTAs.

2.1.3 Asymmetry, Special and Differential Treatment and Variable Geometry

Article XXIV of GATT stipulates that restrictions should be lifted on 'substantially all trade' in a free trade agreement. **The EU has taken a very liberal interpretation on what constitutes "substantially all trade" and, by doing so, has maintained asymmetry in the EU-ESA EPA while still being in full compliance with Article XXIV of GATT.** The extent to which trade is liberalised between Parties entering into a free trade

⁵ Provided the administrative requirements are fulfilled, including the conclusion of adequate arrangements on administrative cooperation and its notification in the EU, in accordance with provisions of Protocol 1.

agreement can be determined by the number of tariff lines on which preferences are given or by the value of trade liberalised. The EU's interpretation of Article XXIV is that an FTA should entail liberalisation of 90 per cent of the total value of trade among the parties. The 90 per cent threshold is the average of total trade between the partners, allowing for an asymmetrical approach to liberalisation. In the EU-ESA EPA context, as the EU is liberalising 100 per cent of its trade, ESA countries could, if they so wished, liberalise a maximum of 80 per cent of their trade, so 90 per cent of total trade is liberalised between the Parties. *De facto*, by this liberal interpretation, the EU is allowing up to 20 per cent of the total value of trade between the two countries to be non-reciprocal trade and allowing ESA countries to protect products they consider to be sensitive, but to do this within the provisions of Article XXIV of GATT.

In addition, the EU has allowed a long adjustment period, allowing the ESA countries until 2022 to fully implement the agreed tariff adjustment schedule. As the EU has maintained duty-free quota-free market access from the CPA into the EPA, this has also introduced an element of asymmetry.

Special and Differential Treatment (SDT) for the ESA LDCs is to be provided to take account of the vulnerability of small landlocked and island countries, including the level and pace of trade liberalisation. The countries that make up the ESA5 have different phase-down schedules, although all need to complete the phase-down schedules by 2022, and different percentages of tariff lines that are liberalised, reflecting SDT being applied. The interim EPA allows variable geometry in that it allows an ESA State in a position to do so to undertake liberalisation within an earlier timeframe and schedule.

The interim EPA provides for inclusiveness of application of development cooperation provisions such that ESA LDCs not in a position to conclude a tariff offer should be able to benefit from all aspects of the EPA. Given that the provisions for economic and development cooperation are in the CPA and the associated EDF, ACP members can benefit from economic and development cooperation, whether or not they are implementing an EPA.

2.1.4 Late Entry

The interim EPA allows ESA LDCs that have not yet submitted tariff reduction offers to do so after the signature of the interim Agreement on the same or flexible conditions and to benefit fully from its provisions. Although these provisions existed in the interim EPA, Zambia, which was part of the original interim EPA negotiations, did not take advantage of the provision as it has not submitted a tariff liberalisation schedule under the EPA. It would seem appropriate to maintain the same provision in the comprehensive EPA so that a member of the ESA grouping could join the EPA but this would have to be done by the new member accepting all conditions of the comprehensive EPA and an immediate tariff phase-down if the country joined the EPA after 2022, meaning that the new entrant would not be able to renegotiate any of the terms of the comprehensive EPA.⁶

2.2 Market Access

2.2.1 Implementation of market access commitments by the EU

The EU has reduced all tariffs to zero on goods that are classified under the EU-ESA EPA as originating from the ESA EPA countries. In introducing the EPAs, the the RoO relating to fishing in that there is no longer a provision on the nationality of the crew were changed. The EU has carried over its market access provisions from the Cotonou Partnership Agreement but, especially under RoO.

As well as the changes introduced in the concept of originating products, other changes include:

⁶ This will be addressed further in the SIA report

- Allowing for ‘accounting segregation’ for materials. Accounting segregation determines how non-originating and originating fungible materials should be tracked (accounted for) when both types are stored together. It allows both types of materials to be tracked not through physical identification and separation but based on an accounting or inventory management system.
- Replacing the provision on ‘direct transport’ by a rule on ‘non-alteration’, which is advantageous to small island countries and land-locked countries as these countries will have difficulty in having direct transport routes to Europe, for example, as logistics will almost certainly involve transport to a hub in a third country and transport on from there. The inclusion of the non-alteration rule could contribute, in a significant way, to trade facilitation between ESA countries and the EU and could be considered best practice in implementing preferential RoO.
- An amendment that allows an ESA country or the EU, or both, to move to self-certification by registered exporters as proof of origin. This option must be activated through a notification to the Customs Cooperation Committee. The EU has activated this clause and has been implementing the Registered Exporter Scheme (REX) since the 1st of September 2020 and in accordance with the EU legislation. The ESA countries have the option of using the Registered Exporter Scheme (REX) as well.

The EU has also supported improved market access, not just in the ESA5 countries, but in all ACP countries through financing Aid-for-Trade programmes that specifically target customs reform and capacity building, removal of non-tariff barriers, and improvements in trade and transport logistics, especially along transport and transit corridors.

Other measures that have been introduced by the EU that have improved the trade environment with the ESA EPA countries include the cessation of export subsidies on all products exported to EPA countries (since 2014); measures with production and trade-distorting effects minimised and the introduction of measures that are designed to protect ESA5 industry from sudden import surges from Europe. The EPA has also included cooperation on technical barriers to trade and in trading and consumer standards in mainly food – animal and plant health.

The EU is considered to be in full compliance with its EPA market access commitments.

2.2.2 *Implementation of market access commitments by the ESA5 states*

In 2009 Mauritius, Seychelles, Zimbabwe and Madagascar signed the interim EPA and the Agreement has been provisionally applied since 14 May 2012. Comoros has provisionally applied the EPA since 7 February 2019.

The main market access commitments and obligations for the ESA EPA countries of the Agreement, in legal terms, are outlined in Chapter II (Trade Regime for Goods), Article 5 through to Article 24 of the Official Journal of the EU (L111 of 24 April 2012) and Annexes.

ESA countries have committed, by 2022, to phase out duties partially, in line with their individual schedules annexed to the interim EPA, as follows:

- **Madagascar** is to liberalise 81 per cent of EU imports
- **Mauritius** is to liberalise 96 per cent of EU imports
- **Seychelles** is to liberalise 98 per cent of EU imports
- **Zimbabwe** is to liberalise 80 per cent of EU imports. Following negotiations and agreement with the EU, Zimbabwe revised its tariff liberalisation schedule but maintained the end date of tariff liberalisation as 2022.

Sensitive products, which make up 19 per cent of Madagascar's imports from the EU, 4 per cent of Mauritius's imports from the EU, 2 per cent of Seychelles' imports from the EU and 20 per cent of Zimbabwe's imports from the EU, are completely excluded from liberalisation. Main exclusions from liberalisation include:

- **Madagascar:** meat, milk and cheese, fisheries, vegetables, cereals, oils and fats, edible preparations, sugar, cocoa, beverages, tobacco, chemicals, plastic and paper articles, textiles, metal articles, furniture.
- **Mauritius:** live animals and meat, edible products of animal origin, fats, edible preparations and beverages, chemicals, plastics and rubber articles of leather and fur skins, iron & steel and consumer electronic goods
- **Seychelles:** meat, fisheries, beverages, tobacco, leather articles, glass and ceramics products and vehicles
- **Zimbabwe:** products of animal origin, cereals, beverages paper, plastics and rubber, textiles and clothing, footwear, glass and ceramics, consumer electronics and vehicles.

The ESA EPA countries have, as yet not adopted self-certification by registered exporters as proof of origin so to qualify for preferential duty rates, products originating in ESA countries must be accompanied by a proof of origin, which remains valid for 10 months, and can be either:

- A Movement Certificate EUR.1 - issued by the customs authorities of the ESA exporting country and supported by documents proving the originating status of the products concerned on request and fulfil the other requirements of the RoO Protocol.
- An invoice declaration – issued by an ESA exporter for consignments valued at €6,000 or less, or by approved exporters, for consignments of any value.

ESA countries have, by and large, complied with selected commitments, meaning the ESA4 (Comoros has just started the process) have complied with commitments where there is a clear process that needs to be committed to, under Chapter II of the interim EPA Agreement.

2.3 Levels of Awareness

During the study, CSOs, Government Officials, national trade promotion agencies, national Revenue Authorities, national Chambers of Commerce, Trade and Industry and private sector companies were interviewed to get an understanding of the levels of awareness faced by ESA5 economic operators in implementing the interim EPA.

The level of awareness of the interim EPA varies by country and by government authority and within the private sector and industry. In all ESA5 countries the level of awareness of government officials in economic ministries, such as ministries dealing with trade, industry, finance and agriculture, are reported to be high. The government officials are aware of the EPA and are also familiar with the processes and procedures that need to be complied with to get preferential market access to the EU market under the interim EPA. It is reported that other government ministry officials usually do not have a high level of awareness of the ESA EPA, but this is not considered to be a challenge as these non-economic ministries are not mainstreamed into the trade agenda.⁷

⁷ There has been a discussion on whether other government departments should be involved to ensure compliance with labour and human rights components of the EPA but as the EPA provisions do not go beyond other international commitments made by the ESA5 countries on labour and human rights, there is no apparent reason for these ministries and government agencies to focus specifically on these provisions in the EPA.

Ministries and agencies addressing small and medium-sized enterprises issues were reported as not being specifically aware of the provisions of the EPA. In discussions with ESA5 government officials and trade promotion agencies, it was pointed out that enterprises that are classified as SMEs in the ESA5 countries are usually too small to compete in the EU market. Thus, a low level of awareness amongst SMEs and those in government working with SMEs is also not a major challenge to the implementation of the EPA. SMEs are not able to benefit from economies of scale to participate in global supply chains or have the resources to comply with EPA requirements.

There is an increasing interest in EPA negotiations by civil society in Zimbabwe, Madagascar, Mauritius and Seychelles. Whereas Zimbabwe still leads in the number of CSOs following the negotiations, there has been an impressive rise in the number of CSOs from Madagascar and Seychelles engaged in EPA negotiations. This was observed from the frequency of articles and blogs on the negotiations published by the CSOs,⁸ self-organised national consultative meetings on EPA negotiations,⁹ and the incorporation of a trade agenda by CSOs in their strategic plans and work plans. CSOs who have higher than average levels of awareness displayed the following characteristics.¹⁰

- They work on socio-economic development issues including trade; investment; intellectual property; human rights; environment; climate change, debt and agriculture as part of their mandates.
- They were members of Civil Society networks such as Africa Trade Network; AFRODAD; Economic Justice Network; Pan African Climate Justice Alliance (PACJA) and Third World Network-Africa, who have played a critical role in raising awareness and building the capacity of their members in research and advocacy on trade and trade-related policies and negotiations.
- They are networked with relevant Government Ministries, Departments and Agencies (MDAs) including Ministries of Trade, Agriculture, Foreign Affairs and the Revenue Authorities. Some of the CSOs, such as the Zimbabwe Council of Churches, are reported to be periodically consulted on EPA implementation.

⁸ See the following links to some knowledge products on EPA Negotiations that respondents quoted: Zimbabwe CSOs Statement on Europe's unfair trade deals: Link: <https://equinetafrica.org/newsletter/id/32225>, EPA update for the African, Caribbean And Pacific (ACP) group link: <http://ictsd.org/i/news/tni/110497/>, Updating on the EPA Negotiations EU ESA Group Link: <http://aejin.org/en/updating-on-the-epa-negotiations-eu-esa-group/>, ESA CSO Statement on the EPA. Link: <https://www.equinetafrica.org/sites/default/files/uploads/documents/ESAtrade020607.pdf>, EU-Eastern and Southern Africa EPA faces collapse. Link: <https://www.bilaterals.org/?eu-eastern-and-southern-africa-epa>, Seychelles hosts meeting with EU, African states on economic partnership. Link: <https://www.bilaterals.org/?seychelles-hosts-meeting-with-eu>, Protecting public health and equitable health services in the services negotiations of the EU-ESA Economic Partnership Agreements. Link: <https://www.equinetafrica.org/sites/default/files/uploads/documents/DIST72EPAservices.pdf>, From Antagonism to Re-engagement: Zimbabwe's Trade Negotiations. Link: https://books.google.co.ug/books?id=C-kvDwAAQBAJ&pg=PA4&jpg=PA4&dq=ESA-EU+EPA+negotiations+AFRODAD&source=bl&ots=nq-DjSyCaf&sig=ACfU3U0VXIQU4t-v7w4fmYU4HgRYYLMLg&hl=en&sa=X&ved=2ahUKEwi8tpS_uZvWAhXx7OAKHThMCr4Q6AEwCHoECAUQAaw#v=onepage&q=ESA-EU%20EPA%20negotiations%20AFRODAD&f=false.

⁹ Interviews conducted revealed that 16 Civil Society Organizations have and periodically organize meetings on EPA negotiations in order to understand the state of play, generate positions and support their Countries to engage in EPA Negotiations and implementation of the interim EPA. These include: : ZimTrade; Zimbabwe Council of Churches; National Women Entrepreneur Council-Mauritius; Citizens Engagement Platform Seychelles; Green Islands Foundation-Seychelles; Centre for Rights and Development-Seychelles; Seychelles Farmers Association; Plateforme Nationale de la Societe Civile Malgache; Malagasy Syndicate of Organic Agriculture (SYMABIO); Environmental Protection and Conservation Organisation (EPCO)-Mauritius; Civil Society Forum-Mauritius; African Forum and Network on Debt and Development; SADAC Council NGO; Zimbabwe Coalition of Debt and Development; Zimbabwe Smallholder Organic Farmers' Forum (ZIMSOF); Southern and Eastern Africa Trade Information and Negotiations Institute (SEATINI)-Zimbabwe; and EQUINET Africa. These also reveal that they have since revised their respective Organisational Strategic Plans to add aspects of Trade Justice and EPA negotiations.

¹⁰ The fact that no CSOs registered to participate in the recently concluded EPA Civil Society Dialogue on the negotiations to deepen the EU-ESA5 EPA, is probably best explained by the fact that the Civil Society Dialogues organised by DG Trade targets the European civil society, so it is not really surprising that there were no CSOs from ESA participating.

Access to information on EPAs comes from many sources but mainly from the internet and websites such as the EU's expansive website(s); ESA5 government websites, including national trade portals and the websites of trade promotion agencies, Bilaterals.org, SEATINI Zimbabwe, Economic Justice Network and Third World Network Africa. Many of the ESA5 government websites give access to the legal text of the EPA as published in the EU's official Journal. There is also a rich source of information and interpretation of EPA provisions in research and consultancy reports. Many of these reports have been prepared using EU resources.

Trade promotion agencies and the private export sector are very aware of EPA provisions and how to benefit from EU preferential market access. The trade promotion agencies actively promote the EPA and assistance is provided through the trade promotion agencies to the export sector to strengthen the export sector in ways that allow them to benefit from EU market access preferences. Numerous examples were given by the national trade promotion agencies of assistance provided through the EU (EDF), or EU member states through bilateral aid, to specific sectors and specific industries. This assistance is targeted to improve competitiveness, such as how to reduce costs of production or improve packaging, and to ensure compliance with EU market access regulations, such as TBT and SPS. This indicates a high level of awareness of the EPA by government officials (as they need to apply for this assistance), of trade promotion agencies (as they need to be involved in the project itself) and the productive sector or industry (the ultimate beneficiary).

2.4 Main Obstacles and Challenges to Implementation

The main obstacles and challenges to implementation of the ESA interim EPA include the following:

2.4.1 *Mitigating tariff loss*

One of the negative aspects of a free trade agreement, at least at the start of implementation, is the tariff loss that takes place because of the introduction of duty-free market access on products that, before the introduction of the free trade area, were dutiable. This is especially the case when countries are heavily dependent on trade taxes to finance the governments' budgets, which is the case for most of the ESA countries. Although it is recognised that the introduction of an FTA will cause tariff losses, there may not be an overall loss to the fiscus as tariff losses can be, and often are, compensated through higher compliance levels and other taxes (such as VAT) coming into play. However, the challenge for ESA5 countries is the immediate impact of tariff reductions on government revenue and the associated delay (lag) in other factors that will compensate for the tariff loss and how to manage the budget in the lag period with reduced revenue streams. The EPA process mitigates a sharp revenue fall because of tariff loss by allowing a long phase-down period – in the ESA EPA case the adjustment period is 10 years, but some countries, Zimbabwe being a case in point, have had difficulties in sequencing their tariff phase-down process.

2.4.2 *Compliance challenges*

The ESA5 private sector companies, including SMEs, find it difficult to take advantage of opportunities presented through the EPA because of quality constraints, costs of production and costs of logistics. The business sector in the ESA5 is not strategically positioned to meaningfully export to the European market and, with business capacity utilisation dropping to about 27 per cent because of the effects of COVID-19, this position can only get worse. Companies reported difficulties in complying with EU Standards and SPS measures, including the REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) regulation that has become extremely costly for SMEs in terms of compliance costs.¹¹ Private standards also constitute an additional barrier to the private sector and SMEs in ESA5 to access the EU Market.

¹¹ No specific figures were reported by stakeholders during the interviews.

2.4.3 *Low levels of investment*

One of the expected outcomes of the EPA process was to attract higher levels of investment into the productive sectors of the ESA EPA countries, with the investors taking advantage of improved market access conditions into the EU market. However, although there has been investment taking place, this is not at the level that has been expected. The main reason for this cannot be addressed through the EPA but would need improvements in governance, reduction in non-tariff barriers, full compliance with the WTO's Trade Facilitation Agreement, and, generally, a more stable investment climate in the ESA5 countries.

2.4.4 *Low levels of cumulation*

The EPA allows for cumulation with other ESA5 countries and the EU and, through the signing of an Administrative Cooperation Agreement, with countries within the same Trade Agreement region. Cumulation allows producers to comply with RoO, and so benefit from preferential market access provisions into the EU and other ESA EPA countries by switching from suppliers of intermediate goods in third countries to suppliers in countries with which the country the producer is located can cumulate with. The low levels of cumulation in the ESA EPA countries could be because other ESA EPA countries do not produce the required intermediate goods, or because it is too expensive to import intermediate goods from the EU, or because the required intermediate goods are not made in the EU. Whatever the reason, cumulation levels within the ESA5 are low and, although ESA5 countries have signed Administrative Cooperation Agreements with non-ESA5 countries, these Administrative Cooperation Agreements have not been utilised.

2.4.5 *Capacity building*

ESA5 countries need more capacity building activities. The National EPA Committees or another body could coordinate the capacity building activities required to allow CSOs, government departments and industry to actively participate not only in developing negotiating positions (which would also benefit the country in all other negotiations, including the AfCFTA negotiations) but also in benefiting from the EPAs themselves. For example, there has been a lot of generic capacity building in RoO, but this is not adequate for the industry. The industry needs to delve into the specific RoO for the products it makes and to understand whether it can comply with the RoO as they are now. If they cannot comply, they would need to understand what needed to change, either in the processes they follow or in the RoO themselves, to allow them to benefit from the EPA. They would then need to either make changes in the supply and value chains they use and so benefit from cumulation provisions to a greater extent or convince the ESA5 countries to negotiate a change in the RoO with the EU. This would require continuous capacity building, most probably provided through the national Chambers of Commerce or Ministry responsible for Industry, rather than from short term technical assistance programmes such as TradeCom II.

2.4.6 *Visibility and Flow of information*

ESA5 countries need to improve the visibility and flow of information. The NEPAC could also be responsible for improving the visibility and flow of information on EPAs, outlining the possible advantages as well as explaining what mitigation is being done to address the negative aspects of EPAs. This improvement in visibility and information flows could take advantage of social media platforms, websites, public meetings, radio programmes and television programmes. The communication strategy could be a part of the National EPA Plan, which could be developed in the same way that Diagnostic Trade Integration Studies are done under the Enhanced Integrated framework.

3. RoO

3.1 Introduction

The overall framework governing RoO is contained in Annex VII of Decision 1/2020.¹² It is based on PSR, these being wholly obtained rules, an *ad valorem* percentage rule, based on maximum amounts of non-originating materials, change of tariff classification rules and specific working or processing requirements. For some products alternative PSR are provided, often a choice between a change of tariff heading and an *ad valorem* percentage requirement, with a lower *ad valorem* percentage allowance for non-originating materials. This is the case, for instance, for the main PSR for Chapter 85 (generators, electric motors, apparatus for communication in a wireless network, microphones, video recording equipment, etc.) where the requirement is either “*Manufacture in which all the materials used are classified within a heading other than that of the product, and the value of all the materials used does not exceed 40% of the ex-works price of the product; or Manufacture in which the value of all the materials used does not exceed 30% of the ex-works price of the product*”.

3.2 RoO – Information Sources

The most comprehensive and authoritative source of information on RoO is the Official Journal of the EU, volume 63 (L93 of 27th March 2020). This is replicated on various national websites and portals in the ESA5 countries, both on government and private sector websites such as on the Mauritius Chamber of Commerce and the Mauritius Revenue Authority websites.

Concerning the dissemination of information on RoO, survey results suggest that the ESA5 stakeholders use the EU's Official Journal or website; national Customs; and websites of respective government, chambers of commerce, and trading community associations. The survey results suggest that there is scope for increasing awareness on RoO through increasing the capacity of Chambers of Commerce and exporter associations. The EU (DG Trade) has recently launched a Rules of Origin Self-Assessment (ROSA) website¹³ which is an interactive website that covers imports into the EU and exports out of the EU with countries with the main EU FTAs partner countries. EPA agreements will be included in ROSA mid/end 2021. The EU-ESA EPA will be included once reviewed. This would be a valuable resource for exporters and importers in the ESA countries as well as Customs administrations in these countries. Another valuable source of information on preferential RoO is the ITC RoO facilitator website.¹⁴ This website does cover imports and exports under the EU-ESA EPA and provides what the MFN rate is and what the preferential rate is if RoO are complied with.

3.3 Preference Utilisation by ESA Countries into the EU¹⁵

In a paper from DG Trade entitled “*Creating opportunities for EU and African Businesses*”¹⁶ the point is made that the ESA EPA provides free access to the EU market for all products made in the ESA5. Other benefits

¹² The RoO for the ESA Interim EPA are contained in E2012/196/EC: Council Decision of 13 July 2009¹². On 14 January 2020, the EPA Committee adopted Decision No 1/2020 (OJ L 93, 27 March 2020)¹² which entered into force on 31 March 2020 and amended certain provisions of Protocol 1. The text of Protocol 1, defining the concept of ‘originating products’ and methods of administrative cooperation to the Interim Agreement, is replaced by the text set out in the Annex to Decision 1/2020 of the EPA Committee. In addition to amending the definition of the concept of ‘originating products’ and methods of administrative cooperation, Decision 1/2020 of the EPA Committee allows for ‘accounting segregation’ for materials, replaces the provision on ‘direct transport’ by a rule on ‘non-alteration’ and introduces the possibility of using the Registered Exporter Scheme (REX) for EU exports to the ESA countries. The inclusion of the non-alteration rule could contribute, in a significant way, to trade facilitation between ESA countries and the EU and could be considered best practice in implementing preferential RoO.

¹³ <https://trade.ec.europa.eu/access-to-markets/en/content/presenting-rosa>

¹⁴ <https://findrulesoforigin.org/>

¹⁵ See Annex VII: Appendix 1-5.

¹⁶ https://trade.ec.europa.eu/doclib/docs/2020/october/tradoc_158986.pdf

related to RoO for the ESA EPA countries are that flexible RoO and cumulation that gives firms more choice when organising their supply chains while still benefitting from duty-free access to the EU market. The main exports of the ESA EPA countries, by value, to the EU in 2019 were tuna, vanilla, textiles, cane sugar, tobacco, diamonds and crustaceans.¹⁷

To estimate the effectiveness of the EU-ESA EPA we have used the EuroStat database to calculate PUR for the EU into the ESA markets and for the ESA countries into the EU market and these derived PUR are given in the annexes to this paper. The PUR is the value of utilised preferences as a share of the value of eligible preferential trade.

What is evident from the data is that for EPA eligible exports from Madagascar, Mauritius, Seychelles and Zimbabwe (Comoros is excluded because it has only recently ratified the EU-ESA EPA) **the four EU-ESA EPA countries make significant use of the EPA preferences made available to them by the EU**. Almost all exports of originating goods from Madagascar and Mauritius enter the EU market free of duty and about 97 per cent of originating goods from Seychelles and 96 per cent of Zimbabwe's originating exports enter the EU market free of duties. There are various reasons why not all of ESA's originating goods are entering the EU market free of duties, including because exporters are not completing the required EUR1 forms or may not have fulfilled the direct consignment requirements rule before it was changed to a non-alteration rule. The direct consignment rule was a difficult rule for the ESA countries to comply with because, being islands or landlocked, they need to tranship their goods via third countries either for geographical or logistical reasons. The newly adopted non-alteration rule may obviate such difficulties. For some exporters, the cost of compliance with administrative formalities to obtain a certificate of origin, either in the time it takes or the financial cost, may be more than the MFN duties paid and, therefore, these exporters may opt to not use trade preferences at all.

Apart from base metals and nickel, which are not dutiable in the EU, **most exports from Madagascar have high PUR**. All fish and fish products that enter the EU market are classified as originating from Madagascar, which means that this fish has been caught by fishing vessels that are registered in an EC Member State or an ESA5 State and which sail under the flag of an EC Member State or of an ESA5 State and which are at least 50 per cent owned by nationals of an EC Member State or an ESA5 State; or are owned by EC Member State or in an ESA5 State as defined in Article 6.2 of Protocol 1.

Madagascar also has a garments and apparel industry that benefits from preferential market access into the EU. **Madagascar managed to benefit even from the double transformation RoO** that applied to garments and apparel when they existed by encouraging firms with vertical integration to import yarn, make fabric and then make garments. In a report entitled *"Where Trade and Industrial Policy Converge: How Developing Countries Can Utilize Trade Preferences to Generate Sustainable, Local Growth in the Garment Sector"* by Colette van der Ven in the International Lawyer publication,¹⁸ it is noted that *"In Madagascar's case, the vertical integration of its apparel industry with Mauritius-also an ACP country-enabled it to meet the double transformation requirement"*.¹⁹

Mauritius takes maximum advantage of preference margins offered by the EU. This was the case under the Lomé and Cotonou agreements as well as under the ESA EPA. Mauritius's biggest export into the EU is Chapter 16 products, which, in this case, is tinned fish from Princess Tuna. All fish and fish products exported into the EU by Mauritius are deemed to be originating from the ESA EPA region which means, as is the case for Madagascar, that fish tinned and exported by Princes Tuna factory²⁰ to the EU is caught by fishing vessels

¹⁷ Ibid.

¹⁸ <https://core.ac.uk/download/pdf/216908861.pdf>

¹⁹ Ibid. Page 71.

²⁰ see <https://www.princesgroup.com/location/princes-tuna-mauritius-riche-terre/>

owned by EU or ESA companies or is within the derogation allowing non-originating fish to be classified as originating fish.

The second largest export from Mauritius into the EU are goods classified under Chapter 61, so articles of apparel and clothing accessories, not knitted or crocheted. Mauritius has a history of developing industries on the back of EU preferences and has incorporated preferences into its industrialisation and trade policies and strategies. For example, its tuna canning industry buys tuna from, usually, EU owned fishing vessels that are fishing in the ESA EPA countries' Exclusive Economic Zones (EEZs) and beyond, so that they benefit from preferences into the EU market.

The main exports from Seychelles to the EU are frozen fish (HS Chapter 03) and canned tuna (HS Chapter 16). The tuna is mainly caught by purse seiner fishing vessels owned by EU nationals and the fish is brought into Victoria fishing harbour on Mahé island. It is then either transferred frozen into reefers and transported, or transhipped, to the EU (this being the HS Chapter 3 fish) or landed in Victoria harbour and moved to the Thai Union Indian Ocean Tuna Limited (IOT) factory where the fish is canned, and the canned fish exported all over the world, including to EU countries.

From the data available, **the third largest export from Seychelles into the EU is mineral fuels**, mineral oils and products of their distillation; bituminous substances; mineral waxes of a limited value of around USD8 million. Although all of this is dutiable and EPA eligible, none of these exports benefit from EPA preferences probably because these products are not originating and/or are re-exports. Further analysis at the national level to identify the reasons for the non-utilisation of trade preferences could usefully be carried out.

The fourth largest export from Seychelles to the EU is products of HS Chapter 90. High tech companies have been encouraged to set up in Seychelles. One of these is Chelle Medical Limited, a subsidiary of Venner Capital SA. Chelle has operated as a medical device assembly contract manufacturer in the International Trade Zone Sector of Seychelles since 1996. These products are not dutiable so enter the EU free of duty without having to use EPA preferences. The fifth largest export from Seychelles to the EU is products of HS Chapter 15, which is most probably a by-product from the fish canning process and is fish oil. Again, this product is not dutiable so enters the EU free of duty without having to use EPA preferences.

3.4 Preference Utilisation by EU into ESA Countries²¹

The EU has been offering duty-free, quota-free market access on all goods originating from the ACP into the EU market for decades and not expecting reciprocity. However, this changed with the introduction of the EPAs and now the EU expects reciprocal treatment, meaning that the EU wants duty-free, quota-free market access into the EPA signatory countries on substantially all trade and in compliance with Article XXIV of GATT. The EPA countries are phasing in this preferential market access and will also maintain a list of sensitive products and are progressively reducing tariffs to zero for 80% or more of their EU imports, according to a schedule of tariff reductions. Once the tariff reduction schedules are complete:

- **Madagascar** should have reduced 81 per cent of its tariff lines to zero. However, after 2022, Madagascar will continue to protect what it determines to be sensitive products, or to protect tax revenues, on goods such as meat, milk and cheese, fisheries, vegetables, cereals, oils and fats, edible preparations, sugar, cocoa, beverages, tobacco, chemicals, plastic and paper articles, textiles, metal articles, furniture.
- **Mauritius** should have reduced 96 per cent of its tariffs to zero by 2022. After 2022 Mauritius will not reduce tariffs on goods such as live animals and meat, edible products of animal origin, fats, edible

²¹ See Appendix 6.

preparations and beverages, chemicals, plastics and rubber articles of leather and fur skins, iron and steel and consumer electronic goods.

- **Seychelles** should have reduced 98 per cent of its tariffs to the EU to zero by 2022. After 2022 Seychelles will still maintain tariffs on goods from the EU including Meat, fisheries, beverages, tobacco, leather articles, glass and ceramics products and vehicles.
- **Zimbabwe** should have reduced 80 per cent of tariffs to the EU by 2022 but, after 2022 will continue to impose tariffs on products of animal origin, cereals, beverages paper, plastics and rubber, textiles and clothing, footwear, glass and ceramics, consumer electronic and vehicles, from the EU.

Although the ESA EPA states have not completed their tariff reduction schedules, they have started the reduction process, and this has increased in goods coming from the EU into the ESA EPA countries. In 2019, exports of wheat and meslin from the EU to the ESA EPA countries increased by 20 per cent (an increase in value of €6.8 million).²²

From calculations done by the COMESA Secretariat²³ using COMSTAT data, PUR for EU goods entering the markets of Madagascar, Mauritius, Seychelles, and Zimbabwe are lower than those of EU from ESA countries. The highest PUR for the top ten EU imports into Madagascar is for Chapter 73 (Articles of iron or steel) with a PUR of 44 per cent. There are three Chapters where the PUR is between 21 per cent and 25 per cent (Articles classified under Chapters 85, 84 and 39) and one at 13 per cent (vehicles) but, for the rest of the top ten imports, by Chapter Head, there is no utilisation of preferences.

The highest reported PUR for the EU into Mauritius is 63 per cent for goods under Chapter 23 (animal fodder) and a 10 per cent PUR for products classified under Chapter 22 (beverages, spirits and vinegar). The rest of the PURs are 3 per cent or lower.

For Seychelles, six of the top ten imports from the EU have PURs of between 35 per cent and 49 per cent (vegetables; fruit and nuts; coffee, tea and spices; processed fish and meat; miscellaneous edible preparations; and cereals, flour, starch or milk) while PURs for the rest of the top ten imports are between 5 per cent and zero.

For Zimbabwe, the highest PUR of the top ten imports from the EU is 7.7 per cent which implies that Zimbabwe has not, yet, made as much progress in its tariff reduction schedule as other ESA EPA countries have.

The PURs available give an indication of the progress being made by the ESA EPA countries and it is expected that, as the ESA EPA countries complete implementation of their tariff reduction schedules and start to use the EPAs more to their advantage, the PUR will also increase.

3.5 Challenges

The main challenges in determining and applying RoO include the following:

- a) **Involving industry in determining ESA EPA negotiating positions on RoO.** The EPA RoO (and most preferential RoO governing African free trade agreements) have their origins in the Lomé Convention, signed in 1975 when manufacturing processes were different from those used 45 years

²² https://trade.ec.europa.eu/doclib/docs/2020/october/tradoc_158986.pdf

²³ This is an ongoing study COMESA is conducting in partnership with the Division for Africa, Least Developed Countries and Special Programmes of UNCTAD.

later.²⁴ There is no doubt that there have been significant changes made by the EU in the PSR which reflect modern manufacturing processes, including the reforms made to the GSP RoO in 2011, and other related reforms, especially for LDCs.²⁵ There is a case to be made that the requirements of some PSR under the current EU-ESA EPA Annex II are not reflecting the manufacturing realities of ESA countries. Compliance with such PSR may demand an investment that may not be commercially viable or because components are not available and cannot be sourced locally or at competitive prices from within the African continent. The alternative is to use cumulation with EU, if commercially viable,²⁶ or allow higher thresholds of non-originating materials and/or more lenient PSR requirements (more liberal change of tariff classification and /or specific working or processing) that are closer to business realities of the manufacturing (or assembly) process. This discussion needs to involve the private sector, and in particular potential investors in “new industries” and these stakeholders need to be consulted by the ESA EPA trade negotiators when preferential RoO are negotiated.

- b) **Understanding of the RoO.** Although access to the RoO themselves is not restricted in that the EU and ESA countries provide access, usually through websites, to the interim EPA Agreement and subsequent changes to the rules, understanding and interpreting the RoO is not easy for businesses, especially small or medium-sized enterprises. Take, for example, the following RoO for essential oils, perfumery, cosmetic or toilet preparations which is a product exported from the ESA into the EU:

HS Heading No (1)	Description of product (2)	Working or processing carried out on non-originating materials that confer originating status (3) or (4)	
ex Chapter 33	Essential oils and resinoids; perfumery, cosmetic or toilet preparations; except for:	Manufacture in which all the materials used are classified within a heading other than that of the product. However, materials classified within the same heading may be used provided their value does not exceed 20 % of the ex-works price of the product	Manufacture in which the value of all the materials used does not exceed 40% of the ex-works price of the product
3301	Essential oils (terpeneless or not), including concretes and absolutes; resinoids; extracted oleoresins; concentrates of essential oils in fats, in fixed oils, in waxes or the like, obtained by enfleurage or maceration; terpenic by-products of the determination of essential oils; aqueous distillates and aqueous solutions of essential oils	Manufacture from materials of any heading, including materials of a different “group” ⁽¹³⁾ in this heading. However, materials of the same group may be used, provided their value does not exceed 20 % of the ex-works price of the product	Manufacture in which the value of all the materials used does not exceed 40 % of the ex-works price of the product

²⁴ Take, for example, the manufacture of the Apple i-Phone, which has a “Made in China” sticker on the box. But the Apple i-Phone is not actually manufactured in China, in the traditional sense, but assembled in China (mainly by a Taiwanese company – Foxconn) from component parts obtained from all over the world. The value addition of the assembly process in China is about 4 per cent of the ex-factory gate price of the i-Phone. The manufacture of smart phones, being high-value, low weight commodities requiring skilled labour, could be an industry the ESA countries may wish to promote and use the EPA to secure investment in. But the ESA EPA RoO for a smart phone (HS 8517) are Manufacture in which the value of all the materials used does not exceed 40 per cent of the ex-works price of the product AND where the value of all the non-originating materials used does not exceed the value of the originating materials used OR Manufacture in which the value of all the materials used does not exceed 25 per cent of the ex-works price of the product.

²⁵ For a summary of preferential RoO reforms, see https://ec.europa.eu/taxation_customs/business/calculation-customs-duties/rules-origin/general-aspects-preferential-origin/new-developments_en

²⁶ The challenge will be that cif cost of items sourced from the EU will, most likely, be prohibitive, or that component parts used by the EU are sourced from Asia.

The understanding of such a rule or origin is time-consuming, and it may be necessary to involve more than one set of expertise, such as expertise in tax compliance, production and procurement. A firm may need to make a significant investment in first understanding how to comply with PSR requirements and related administrative procedures and then invest further in complying with the PSR. This must be done even before the firm can determine whether the costs of compliance will warrant the savings incurred through taking advantage of preferences. The duty savings are proportional to the preferential margin, which is the difference between MFN rates and preferential rates, which, in the case of the EU-ESA EPA, is a duty rate of zero.

- c) **Being able to Adapt.** Some countries, Mauritius being a good example, have based their trade and industry strategies on taking advantage of preferential RoO. The sugar, processed fish and textile and garment industries in Mauritius are examples of that country's companies taking full advantage of the preferential market access opportunities offered by the EU before the introduction of EPAs. Now that conditions in Mauritius, in the EU and in the rest of the ACP, which is competition for Mauritius, have changed, Mauritian industries need to adapt quickly to take account of these changes. Mauritius has taken steps to adapt so, for example, has moved into niche markets for sugar and into service industries. Mauritius has shown that it can adapt quicker and more substantially than other economies in the ESA group. The other countries could take advantage of the development component of EPAs to explore new sectors where there are opportunities to take advantage of and to put in place a programme that will attract foreign direct investment into these sectors and new opportunities.

The above-mentioned challenges do not stop producers in the EU-ESA EPA from taking advantage of the duty-free, quota-free market access offered by the EU under EPAs. The ESA countries (excluding Comoros) have between 96 per cent and 100 per cent PUR in the EU. But exports benefitting from preferential market access are in very few commodities and almost exclusively in wholly produced commodities, such as fish and fish products, sugar, spices and nuts, which are regarded as traditional exports for the ESA EPA countries and there is no available evidence to suggest that new investors are coming into the ESA countries to take advantage of market access into the EU in sectors other than the traditional commodity-based markets.

Specific challenges on RoO raised by survey respondents, and not addressed elsewhere, including the following:

- According to the surveys, the quota of the automatic derogation for fish is too low, while the specific tolerance rules of 15% in the PSR for the fisheries sector are difficult to apply.²⁷ Under the Cotonou Partnership Agreement, there was an annual automatic derogation to use a total of 8,000 metric tonnes of non-originating fish for canning and 2,000 metric tonnes of non-originating tuna loins for all 77 countries of the ACP group. A major gain for the EU-ESA EPA was to get the same volume of automatic derogation for non-originating tuna for canning (8000 metric tons) for Mauritius, Seychelles and Madagascar and non-originating tuna loins (2000 metric tons) for Mauritius and Seychelles.
- Thai Union IOT reported that there were times when it had difficulty securing enough tuna for its cannery to operate at full capacity from the EU fishing vessels off-loading catch in Victoria. This was a seasonal challenge as well as because of Yellowfin tuna catch limits. When the licensed EU vessels were nearing their Yellowfin tuna catch limit, the vessel stayed in port, meaning that fewer vessels were fishing so the overall catch available to Thai Union's canning factory was reduced. Thai Union's Indian Ocean Tuna (IOT) cannery suggested that, under these circumstances, the 8,000-tonne derogation should be re-assessed.

²⁷ This is also a finding from the Fisheries study done for Seychelles by TradeCom II "P045: Strengthening capacity to improve trade-related SPS conformity and capacity building for competitive fisheries export in Seychelles".

- Thai Union IOT also suggested that the rules governing the 15 per cent *de minimis* needed further clarification. It is, apparently, not allowed, or not a good practice at least, to put fish meat from more than one fish into a can of tuna. Therefore, practically, a can of tuna cannot contain 15 per cent non-originating fish and 85 per cent originating fish. The value tolerance (*de minimis*) therefore needs to be calculated by consignment or use of another metric and it is this clarification that is being sought.
- The administrative burden to firms of proving compliance has been quoted as being onerous and implies greater production costs to firms. It can involve maintaining batch-level production records, identifying all materials used and the sourcing, costs, and origin status of those materials. Customs are generally allowed to review and verify the origin of goods entered under preferences for around five years after the goods are released, depending on the agreement. Firms that seek to benefit from preference must be able to produce these records on demand at any point in that period.

3.6 Use of Cumulation

Customs and the Chambers of Commerce in Mauritius and Seychelles report that exporters are using bilateral cumulation in the production of prepared or preserved fish (HS1604), vanilla pods (HS08905) and reduced-sized models and similar recreational models (HS9503) but are unable to use the diagonal cumulation provisions. This is because diagonal cumulation may become operational only when the conditions laid out in paragraph 6 of article 4 of Protocol 1 on RoO of the EU-ESA EPA are fulfilled. These conditions are as follows:

“The cumulation provided in this Article may only be applied provided that:

- a) the countries involved in the acquisition of the originating status and the country of destination have concluded an agreement on administrative cooperation which ensures correct implementation of this Article;*
- b) materials and products have acquired originating status by the application of the same RoO as provided in this Protocol; “*

ESA countries maintain that the conclusion of an agreement on administrative cooperation is particularly burdensome. The Joint Undertaking on Administrative Cooperation for the implementation of cumulation provisions contained in the EPAs make provision, amongst other things, for evidence of the origin of products, materials, working and/or processing, conditions for the issuance and acceptance of proofs of origin, notification of Customs Authorities, verification of proof of origin, verification of suppliers' declarations and a dispute settlement mechanism. The ACP Secretariat has provided a model of an agreement of administrative cooperation and consultants under TradeCom II, and perhaps others, have explained the process of how to conclude an Administrative Cooperation Agreement, and some ESA EPA countries have visited countries with which they want to sign an Administrative Cooperation Agreements, and it is not clear why the ESA EPA countries have difficulty in concluding these agreements, which would allow a greater level of cumulation to take place.

3.7 Capacity of Customs

In general, Customs of ESA EPA countries can properly apply, implement and administer the preferential RoO used in the EU-ESA interim EPA and have no major challenges in applying RoO including the system of establishing the proofs of origin, subsequent verification of origin and administrative cooperation with the EU Member States' customs authorities.

There are some occasional challenges such as, for example, the classification of Omega 3 oil. There has been some interest in Seychelles in producing Omega 3 oil and exporting the oil. The tariff classification for Omega 3 oil will depend on what processes are used to manufacture the Omega 3 oil. If, for example, the Omega 3

oil is used as a medicament it could be classified under HS30.03 or HS30.04. If it is not chemically modified it could be classified under 15.16 but if it is chemically modified, it could be classified under HS15.17. However, these kinds of issues are not intractable and can be solved through a discussion between the relevant ESA country's Customs and DG TAXUD and/or the customs authority of the EU country the product is going to and an agreement (advance ruling even) can be reached. ESA Customs authorities have the capacity and capability to have these discussions and to make the necessary agreements. What is needed is to strengthen cooperation between the Customs Authorities of the exporting country and the importing country and this is an ongoing process. Administrative cooperation on customs matters is needed to implement operational issues such as cumulation.

3.8 Conclusions

The overall objective of EPAs, in terms of trade, is to increase the amount of trade between the EU and the countries that have signed EPAs. This is to be achieved by putting in place preferential market access arrangements between the two trading partners. An important component of a preferential market access arrangement is the RoO, which should encourage trade to take place, so be "liberal", but which should also promote production in the free trade area and restrict, to the extent possible, trade deflection from taking place, so be "restrictive". RoO need to strike a balance to allow the integration of industry into global value chains to facilitate trade while promoting the use of domestic production and avoiding trade circumvention. However, it is impossible to arrive at RoO that all stakeholders will be happy with as there will be some, even in ESA EPA countries, whose interests are best served by more restrictive RoO and some whose interests are best served by more liberal RoO.

There have been changes made to the EU-ESA EPA RoO that have made them simpler, including the possibility to fully move to self-certification, which simplifies the administrative burden to declare the origin compared to the issuance of movement certificates EUR.1, signed and stamped by customs authorities; and the introduction of non-alteration rules, which should substantially reduce the cost of compliances. For RoO to be improved further, for the benefit of most stakeholders, the EU and the ESA5 could consider the following:

- 1) **The ESA RoO could be further simplified and liberalised.** For example, in the Generalised Scheme of Preferences (GSP), there is a single PSR for all of HS Chapter 37, with the PRS being a change of tariff heading rule with a 20 per cent value tolerance, and, perhaps most importantly, the allowance of non-originating inputs is 50 per cent, a significant trade liberalisation step. The GSP PSR is given below:

HS Heading No (1)	Description of product (2)	Working or processing carried out on non-originating materials that confer originating status (3) or (4)	
Chapter 37	Photographic or cinematographic goods	Manufacture in which all the materials used are classified within a heading other than that of the product. However, materials classified within the same heading may be used provided their value does not exceed 20 % of the ex-works price of the product	Manufacture in which the value of all the materials used does not exceed 60% of the ex-works price of the product

Although Chapter 37 products (Photographic or cinematographic goods) are not important exports for the ESA5 countries, the principle of how the PSR has been liberalised and progressively simplified, is important. If this principle is applied to other Chapters, it would mean that, where possible and feasible, one PSR could be used per chapter and the PSR could be liberalised further with a higher value of non-originating materials allowed.

- 2) There have been many initiatives to **build capacity in RoO in the ESA countries**, such as through the TradeCom programmes and technical assistance programmes managed through COMESA. There is no doubt that these Technical Assistance and Capacity Building (TACB) programmes have had a positive impact and have built the capacity of stakeholders in ESA EPA countries on PSR. However, these TACB programmes have mainly targeted government officials and Customs staff rather than the primary beneficiaries of the EPA, these being producers and exporters in the private sector. This is not an intentional outcome, and most TACB programmes on RoO specify that the private sector producers need to be involved and are beneficiaries. But the private sector does not usually have the time or the resources to devote to learning about PSR in a generic sense, which is what the TACB programmes usually deliver, such as producing a training manual and face-to-face training on RoO.²⁸ Thus, a TACB programme that can give firms one-on-one advice on EU market access issues, including advice on how to comply with RoO, advice on where the firms can source parts to allow them to meet local materials requirements through the use of cumulation, advice on how to put in place administrative cooperation agreements and generally improve the levels of cumulation, would be really helpful. One way for countries to provide this detailed, product-specific one-on-one advice and assistance to individual firms would be for each EPA country to have a draw-down facility which would support a specific company to get PSR assistance and expertise to advise on compliance for the products of that specific company or investor. This activity would also be a precious source of information to make recommendations on what RoO would be appropriate for a particular company and industry.
- 3) **A closer linkage of the development and trade components of the EPA.** Although EPAs are often thought of, primarily, as being trade deals, they also have a developmental objective, including supporting sustainable development and poverty alleviation, promoting regional integration and linking trade policy with tools for development. To maximise their effect, EPAs should be integrated, or mainstreamed, into the ESA5 countries' trade policies. However, it is often, but not always, the case that EPA signatories are more concerned about possible negative impacts of a trade deal, such as revenue loss from tariff reductions, and the penetration of their markets by, in this case, European-based firms, than they are about taking advantage of improved market access. All tariff reduction schedules for the ESA5 countries should be completed by 2022 so all ESA5 countries should now be well on the way to making the adjustments necessary to counter any possible negative aspects of EPAs. This could be further supported through an even closer alignment of the development component of EPAs with the trade component.

For example, each country is preparing a national implementation plan for the EPA and these plans will focus on sustainable development aspects but may not focus on how a trade component can feed into sustainable development. A national implementation plan could start with identifying what products (or services) the ESA country has or can have, a competitive advantage in, especially in the EU market, with preferences. Once this has been established, ESA countries could look at what constraints they face to ensure the products to be traded are classified as originating. If PSR need to

²⁸ The exception to this is the TACB programmes financed by the EU on PSR related to fisheries that have been delivered primarily in Seychelles and Mauritius. Although these TACB programmes focus on fisheries, they are generic in that sector. For example, the requirements of Thai Union IOT and Princes Tuna would be to have a consultant to look at, for example, how a de minimis level could be increased, or how they could cumulate with countries outside of the region, or how they could improve market access into the EU for a specific product, such as Omega 3 oil, and the TACB programmes mentioned do not provide that level of detail or support.

be adjusted to ensure the goods are classified as originating then the ESA country needs to prepare its negotiating position to argue its case, which should also include estimates of impact on poverty alleviation and sustainable development.

- 4) **Involve the private sector and potential new investors in developing negotiating positions, to the extent possible.** The EU and its ESA partners in the EU-ESA EPA are continually improving PSR. The last improvement introduced accounting segregation for materials, relaxed the 'direct transport' rule by replacing it with a 'non-alteration' rule and introduced the possibility of using the Registered Exporter Scheme (REX) for EU exports to the ESA countries. These changes will benefit existing producers in the ESA5 countries but may not attract new investors in new industries or suppliers in new, or non-traditional, global value chains unless accompanying measures are undertaken at the national level. The ESA5 countries must define in their trade and industrialisation policies what the target industries and value chains are into the EU market and involve the potential investors and private sector stakeholders in preparing negotiating positions, including proposed changes to PSR, to ensure the agreed RoO can be complied with so that these "new" producers can benefit from the preferences offered by the EU.

4. Analysis of trade and investment flows

Madagascar, Mauritius, Seychelles and Zimbabwe have provisionally applied the interim EPA since May 2012. As a part of the interim EPA, the EU offers duty-free quota-free access for all imports from ESA4 countries. This access to the EU market is permanent, full and free to all products. There are sensitive products that are excluded from liberalisation. These vary according to the individual offer of each ESA country. However, they include mainly agricultural products as well as a set of industrial goods, including plastics, paper and textiles in Table 1.²⁹

Table 1: Main sensitive products excluded from liberalisation, per ESA country³⁰

Madagascar	Meat, milk and cheese, fisheries, vegetables, cereals, oils and fats, edible preparations, sugar, cocoa, beverages, tobacco, chemicals, plastic and paper articles, textiles, metal articles, furniture
Mauritius	Live animals and meat, edible products of animal origin, fats, edible preparations and beverages, chemicals, plastics and rubber articles of leather and fur skins, iron & steel and consumer electronic goods
Seychelles	Meat, fisheries, beverages, tobacco, leather articles, glass and ceramics products and vehicles
Zimbabwe	Products of animal origin, cereals, beverages paper, plastics and rubber, textiles and clothing, footwear, glass and ceramics, consumer electronic and vehicles

Source: European Commission

4.1 Patterns in ESA4 goods trade

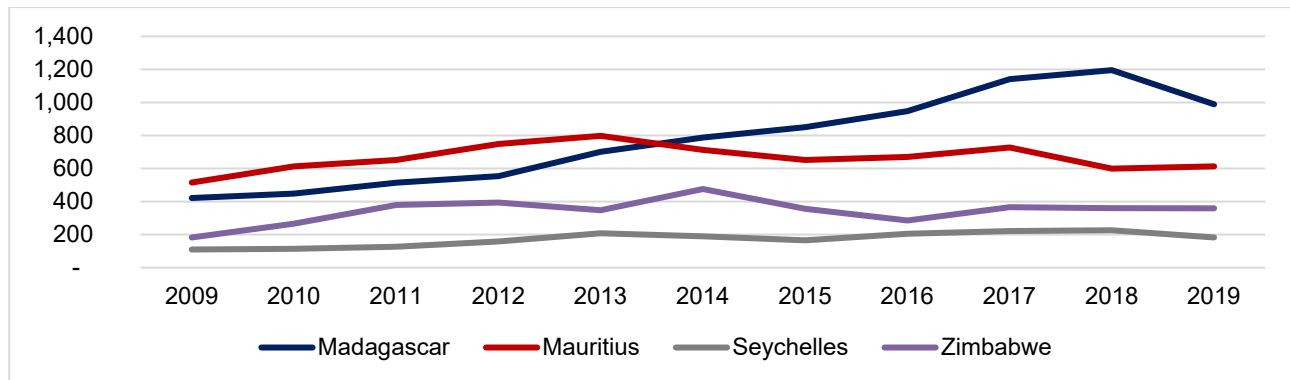
4.1.1 Patterns in ESA4 countries' goods exports to the EU

ESA4 countries' goods exports followed different trends in the period 2009 to 2019. Diverging trends also emerge for the period that followed the elimination of import tariffs by the EU in 2012. Exports from Madagascar (CAGR:³¹ +8.6%) to the EU show an upward trend following the year 2012. Exports from Seychelles remained relatively stable (CAGR: +2%), while exports from Mauritius (CAGR: -2.8%) and Zimbabwe (CAGR: -1.3%) slightly declined. Amounting to 989 million EUR in goods exports to the EU in 2019, Madagascar is the largest ESA4 exporter to the EU, followed by Mauritius (613 million EUR), Zimbabwe (359 million EUR) and Seychelles (182 million EUR). This is outlined in Figure 2 and Figure 3.

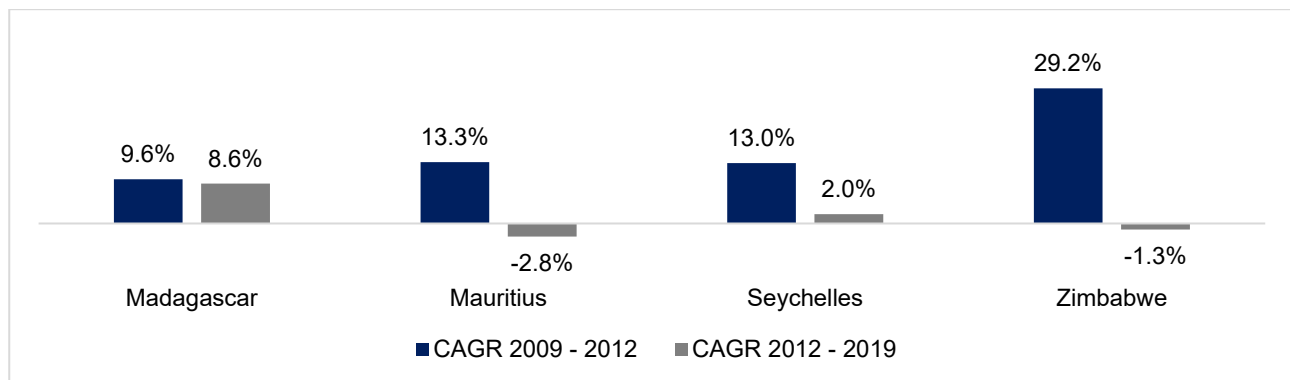
²⁹ The analysis of trade flows accounts for the fact that individual partner countries' tariff liberalisation processes started at different points in time. The EU eliminated import tariffs already in 2012. Mauritius and the Seychelles started liberalising tariffs on EU imports in 2013, and Madagascar and Zimbabwe started liberalising in 2016 and 2017 respectively. Accordingly, the analysis of ESA4 countries' exports to the EU and other jurisdictions focuses mainly on the period 2012-2019, i.e. the period following the tariff elimination on the side of the EU. The analysis of ESA4 countries' imports from the EU and other jurisdictions focuses mainly on the period that followed the beginning of the tariff liberalisation process in individual ESA4 countries, i.e. 2016-2019 for Madagascar, 2013-2019 for Mauritius, 2013-2019 for the Seychelles, and 2017-2019 for Zimbabwe.

³⁰ European Commission. Access2Markets Portal. Available at: <https://trade.ec.europa.eu/access-to-markets/en/content/epa-eastern-and-southern-africa>

³¹ Compound annual growth rate.

Figure 2: Development of ESA4 countries' total goods exports to the EU27, in million EUR

Source: Eurostat.

Figure 3: Compound average annual growth rates of ESA4 countries' goods exports to the EU27

Source: Eurostat. Note: Numbers represent growth in trade value.

4.1.2 Diversification of goods exports from ESA4 countries to the EU

Goods trade statistics indicate that ESA4 countries' exports to the EU are generally highly concentrated among the top 20 export commodities (Table 2). The concentration of exports within the top 20 export commodities increased for Madagascar, Mauritius and Zimbabwe after 2012 while remaining unchanged for Seychelles. This trend indicates increased specialisation in commodities in which ESA4 countries have international competitive advantages (see individual country analyses below). The concentration ratio within the group of top 20 commodities only increased for Madagascar, reflecting a stronger concentration on fewer export commodities in 2019 compared to 2012.³²

Table 2: Development of concentration/diversification among ESA4 countries' top 20 exports to the EU27, HS 4 categories

Exports to EU27	2019		2012	
	Share of top 20 exports	HHI ³³ top 20 exports	Share of top 20 exports	HHI top 20 exports
Madagascar	85%	0.13	80%	0.10
Mauritius	82%	0.17	65%	0.17

³² Based on the calculation of the Herfindahl-Hirschman Index, which is a common measure of market concentration.

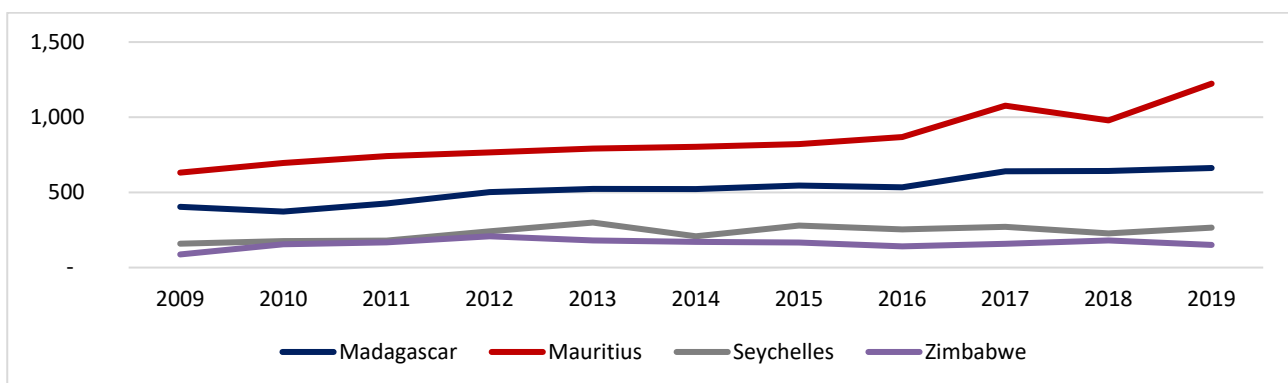
Seychelles	100%	0.61	100%	0.96
Zimbabwe	100%	0.76	88%	0.81

Source: UN Comtrade. Note: The EU eliminated import tariffs in 2012. The Herfindahl-Hirschman Index (HHI) is a common measure of commodity concentration of exports and imports. Higher values indicate that exports are concentrated on fewer commodities.

4.1.3 Patterns in ESA4 countries' goods imports from the EU

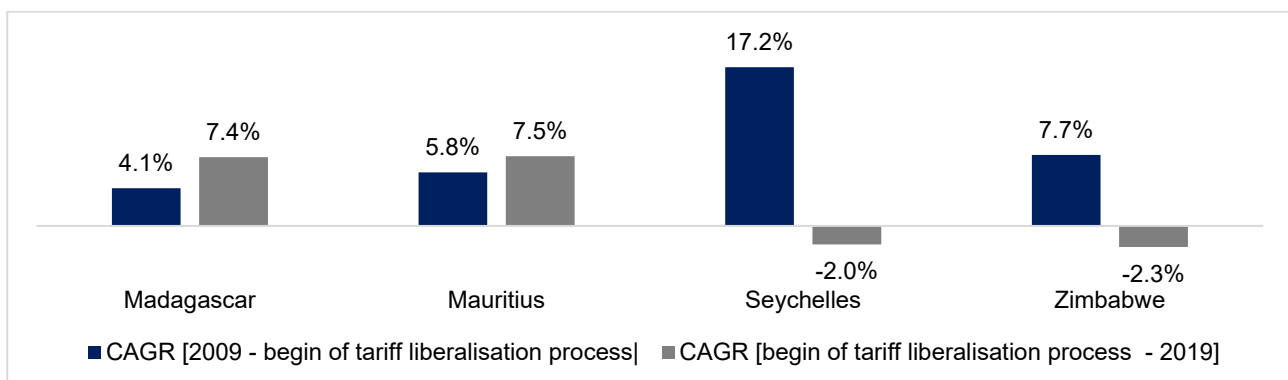
ESA4 countries' goods imports from the EU follow different trends for the period 2009 to 2019 (Figure 4 and Figure 5). Diverging trends also emerge for the period that followed the elimination of import tariffs by ESA4 countries. Total EU goods exports to Madagascar (2016-2019 CAGR: +7.4%) and Mauritius (2013-2019 CAGR: +7.5%) significantly increased after the beginning of the tariff liberalisation process. Total EU goods exports to Seychelles (2013-2019 CAGR: -2%) and Zimbabwe (2017-2019 CAGR: -2.3%) remained largely unchanged after 2013 and 2017 respectively. Amounting to 1.2 billion EUR in imports from the EU in 2019, Mauritius is the largest ESA4 importer of goods exported from the EU, followed by Madagascar (662 million EUR), Seychelles (265 million EUR) and Zimbabwe (151 million EUR).

Figure 4: Development of ESA4 countries' total goods imports from the EU27, in million EUR



Source: Eurostat. Note: The EU eliminated import tariffs in 2012. Mauritius and Seychelles started liberalising tariffs on EU imports in 2013 and Madagascar and Zimbabwe started liberalising in 2016 and 2017 respectively.

Figure 5: Compound average annual growth rates of ESA4 countries' goods imports from the EU27



Source: Eurostat. Note: The EU eliminated import tariffs in 2012. Mauritius and Seychelles started liberalising tariffs on EU imports in 2013 and Madagascar and Zimbabwe started liberalising in 2016 and 2017 respectively.

4.1.4 Diversification of ESA4 countries' goods imports from the EU

Goods trade statistics for 2019 indicate that EU goods exports to Mauritius and Seychelles are generally more diversified compared to the year marking the beginning of the tariff liberalisation process (Table 3). Lower shares of the top 20 commodities in total goods exports and lower concentration

ratios for the top 20 export commodities indicate improved market access conditions for EU goods exporters. A similar pattern emerges for Zimbabwe, although the numbers should be interpreted with caution, given the short time horizon following the year of the beginning of the tariff liberalisation process (two years) and Zimbabwe's recent political and economic crisis. EU goods exports to Madagascar are slightly more concentrated among the top 20 commodities, with a slightly higher concentration within the top 20 import commodities in 2019 compared to 2016.

Table 3: Development of concentration/diversification among ESA4 countries' top 20 imports from the EU27, HS 4 categories

	2019		Year marking the start of the tariff liberalisation process	
Imports from EU27	Share of top 20 exports	HHI top 20 exports	Share of top 20 exports	HHI top 20 exports
Madagascar	45%	0.08	37%	0.06
Mauritius	46%	0.09	47%	0.18
Seychelles	60%	0.26	72%	0.43
Zimbabwe	65%	0.10	70%	0.13

Source: UN Comtrade. Note: The EU eliminated import tariffs in 2012. Mauritius and Seychelles started liberalising tariffs on EU imports in 2013 and Madagascar and Zimbabwe started liberalising in 2016 and 2017 respectively. Source: UN Comtrade. Note: The EU eliminated import tariffs in 2012. The Herfindahl-Hirschman Index (HHI) is a common measure of commodity concentration of exports and imports. Higher values indicate that exports are concentrated on fewer commodities.

4.1.5 Patterns in ESA4 trade with non-EU jurisdictions and regional trade integration

ESA4 countries' total goods exports to non-EU jurisdictions increased significantly in the period 2012 to 2019, indicating that **ESA4 countries' businesses deepened their international trade relationships with the rest of the world and also contributed to the deepening of regional (intra-African) trade integration (Table 2)**. As concerns, the latter, growth in goods exports to (neighbouring) African countries (members of EAC, SADC and COMESA) was often higher than growth in goods exports to the rest of the world, with the exemption of Zimbabwe, whose economy suffered from a political and economic crisis in 2019. As outlined by Table 5, except for Zimbabwe, ESA4 countries' imports from non-EU jurisdictions also increased strongly in the period marking the beginning of the tariff liberalisation process in ESA4 countries and 2019. It should be noted though that growth in goods imports from non-EU jurisdictions to ESA4 countries were generally lower than growth in ESA4 countries overall goods exports to non-EU jurisdictions.

Trade statistics indicate that ESA4 countries' goods exports to non-EU jurisdictions are generally highly concentrated among the top 20 commodities exported to these jurisdictions (Table 6). This pattern is most pronounced for ESA countries' goods exports to EAC, SADC and COMESA trading blocs, indicating a trend toward increased specialisation in commodities in which ESA4 countries have international competitive advantages. The patterns in concentration ratios for ESA countries' top 20 export commodities are generally more diverse. As different patterns emerge for individual ESA4 countries and their export partners, the derivation of conclusions would require further export destination-specific analysis. A diverse picture also emerges for goods imports to ESA4 countries for which indicators of top 20 concentration in total trade and concentration within the groups of top 20 import commodities are provided by Table 7.

Table 4: Annual growth rates of ESA4 countries' exports to the rest of the world and countries comprising the regional trade areas of EAC, SADC and COMESA, 2012 – 2019.

Total growth in ESA4 countries' goods exports	WORLD ex EU27	East African Community (EAC)	Southern African Development Community (SADC)	COMESA
Madagascar	17%	25%	12%	11%
Mauritius	3%	21%	3%	12%
Seychelles	16%	-1%	26%	21%
Zimbabwe	9%	64%	-2%	2%

Source: UN Comtrade.

Table 5: Annual growth rates of ESA4 countries' imports from the rest of the world and countries comprising the regional trade areas of EAC, SADC and COMESA, beginning of tariff liberalisation process – 2019

Total growth in ESA4 countries' goods imports	WORLD ex EU27	East African Community (EAC)	Southern African Development Community (SADC)	COMESA
Madagascar	22%	26%	6%	7%
Mauritius	0%	-4%	4%	3%
Seychelles	9%	-1%	5%	2%
Zimbabwe	-1%	1%	-1%	-1%

Source: UN Comtrade.

Table 6: Development of concentration/diversification among ESA4 countries' top 20 exports to the rest of the world and countries comprising the regional trade areas of EAC, SADC and COMESA

	2019		2012	
Exports to WORLD ex EU27	Share of top 20 exports	HHI top 20 exports	Share of top 20 exports	HHI top 20 exports
Madagascar	92%	0.15	97%	0.14
Mauritius	69%	0.08	90%	0.14
Seychelles	98%	0.21	91%	0.13
Zimbabwe	93%	0.17	74%	0.16
	2019		2012	
Exports to EAC	Share of top 20 exports	HHI top 20 exports	Share of top 20 exports	HHI top 20 exports
Madagascar	100%	0.24	100%	0.20
Mauritius	99%	0.47	95%	0.18
Seychelles	100%	0.61	100%	0.43
Zimbabwe	100%	0.98	98%	0.12

	2019		2012	
Exports to SADC	Share of top 20 exports	HHI top 20 exports	Share of top 20 exports	HHI top 20 exports
Madagascar	89%	0.09	84%	0.08
Mauritius	72%	0.08	86%	0.14
Seychelles	99%	0.49	96%	0.13
Zimbabwe	91%	0.20	92%	0.17
	2019		2012	
Exports to COMESA	Share of top 20 exports	HHI top 20 exports	Share of top 20 exports	HHI top 20 exports
Madagascar	89%	0.16	80%	0.11
Mauritius	73%	0.10	77%	0.08
Seychelles	100%	0.53	98%	0.16
Zimbabwe	79%	0.21	66%	0.13

Source: UN Comtrade. Note: The EU eliminated import tariffs in 2012. The Herfindahl-Hirschman Index (HHI) is a common measure of commodity concentration of exports and imports. Higher values indicate that exports are concentrated on fewer commodities.

Table 7: Development of concentration/diversification among ESA4 countries' top 20 imports from the rest of the world and countries comprising the regional trade areas of EAC, SADC and COMESA

Imports from WORLD ex EU27	Share of top 20 imports	HHI top 20 imports	Share of top 20 imports	HHI top 20 imports
Madagascar	54%	0.17	51%	0.15
Mauritius	49%	0.19	53%	0.23
Seychelles	64%	0.32	59%	0.32
Zimbabwe	55%	0.29	57%	0.22
	2019		Year marking the begin of the begin of tariff liberalisation process	
Imports from EAC	Share of top 20 imports	HHI top 20 imports	Share of top 20 imports	HHI top 20 imports
Madagascar	97%	0.21	88%	0.11
Mauritius	99%	0.64	99%	0.51
Seychelles	76%	0.14	80%	0.14
Zimbabwe	94%	0.15	90%	0.14
	2019		Year marking the begin of the begin of tariff liberalisation process	
Imports from SADC	Share of top 20 imports	HHI top 20 imports	Share of top 20 imports	HHI top 20 imports
Madagascar	59%	0.07	71%	0.07
Mauritius	69%	0.13	59%	0.13

Seychelles	35%	0.07	43%	0.07
Zimbabwe	39%	0.06	41%	0.08
	2019		Year marking the begin of the begin of tariff liberalisation process	
Imports from COMESA	Share of top 20 imports	HHI top 20 imports	Share of top 20 imports	HHI top 20 imports
Madagascar	69%	0.09	79%	0.08
Mauritius	89%	0.17	88%	0.19
Seychelles	43%	0.06	57%	0.09
Zimbabwe	68%	0.08	74%	0.07

Source: UN Comtrade. Note: The EU eliminated import tariffs in 2012. Mauritius and Seychelles started liberalising tariffs on EU imports in 2013 and Madagascar and Zimbabwe started liberalising in 2016 and 2017 respectively. Source: UN Comtrade. Note: The EU eliminated import tariffs in 2012. The Herfindahl-Hirschman Index (HHI) is a common measure of commodity concentration of exports and imports. Higher values indicate that exports are concentrated on fewer commodities.

Trade patterns Madagascar

In 2019, Madagascar's top 20 goods exports to the EU accounted for about 85% of the country's total goods exports to the EU. Madagascar's top 2019 goods exports to the EU were vanilla (24.6% of total goods exports to the EU), jerseys, pullovers and cardigans (9.7%), crustaceans (8.4%) and unwrought nickel (7.8%). Compared to 2012, exports of vanilla increased by an annual growth rate of 64% (absolute growth of 3518%). Exports of jerseys, pullovers and cardigans remained largely unchanged, while exports of crustaceans increased by 5.6% annually. Exports of cobalt mattes, essential oils, cocoa beans and vegetable spats also expanded at relatively high growth rates (see Table 38 and Table 39).

Madagascar's top 20 goods imports from the EU accounted for about 45% of the country's total goods imports from the EU in 2019. The EU's top 2019 export commodities in trade with Madagascar were pharmaceuticals (7.7% of total EU exports to Madagascar), shawls, scarves, mufflers (4.6%), unused postage (4.1%), and motor vehicles (a combined 7.3%). Compared to 2016, the year marking the beginning of tariff liberalisation in Madagascar, trade in these commodities grew significantly (see Table 41 and Table 42). Madagascar's imports of pharmaceuticals from the EU increased by 41.1% annually, imports of shawls, scarves and mufflers increased substantially by 3016% annually, whereas imports of motor vehicles increased by 28% annually. Generally, the highest import growth rates are registered for miscellaneous textiles products and electrical equipment such as telephones and data processing machines.

Madagascar's commodity exports to non-EU jurisdictions partly mirror the country's commodity exports to the EU. Raw materials such as gold titanium and cobalt products, as well as vanilla, vegetable products and textiles generally account for high shares in Madagascar's total goods exports to the rest of the world and neighbouring African countries. On the import side, Madagascar's goods imports are characterised by high shares of petroleum products imports and imports of various agricultural commodities, various manufactured commodities, such as electrical and machinery equipment, and imports of pharmaceuticals (see Table 43 to Table 50).

Trade patterns Mauritius

In 2019, Mauritius' top 20 goods exports to the EU accounted for about 82% of the country's total goods exports to the EU. Mauritius' top 2019 goods exports to the EU were prepared or preserved fish (28.1% of total goods exports to the EU), cane or beet sugar (14.8%), T-shirts, singlets and vests (8.2%) and

other textiles products. Compared to 2012, exports of fish and sugar products decreased by -4.4% annually and -8.5% annually respectively. The highest export growth rates are registered for men's or boys' shirts, which increased by an annual growth rate of 28%, and exports of other garments, which increased by 43.5% annually. Medicaments and fish fillets also experienced strong export growth (see Table 52 and Table 53).

In 2019, Mauritius' top 20 goods imports from the EU accounted for about 46% of the country's total goods imports from the EU. The EU's top 2019 export commodities in trade with Mauritius were frozen fish (excluding fish fillet; 7.2% of total EU exports to Mauritius), motor cars (6.2%), diamonds (6.2%), and pharmaceuticals (4.4%). Compared to 2013, the year marking the beginning of tariff liberalisation in Mauritius, diamonds experienced significant export growth (30.3% annually). The highest annual export growth is registered for petroleum gases (412%) and animal feeding products (30.5%; see Table 55 and Table 56).

Mauritius' commodity exports to non-EU jurisdictions partly mirror the country's commodity exports to the EU. Textiles, fishery products and products of light manufacturing generally account for high shares in Mauritius' total goods exports to the rest of the world and neighbouring African countries. On the import side, Mauritius' goods imports are characterised by high shares of petroleum products, motor cars, fishery products, various agricultural commodities, various manufactured commodities, such as textiles, electrical and machinery equipment and medicines (see Table 57 to Table 64).

Trade patterns Seychelles

In 2019, Seychelles' top 20 goods exports to the EU accounted for about 100% of the country's total goods exports to the EU. Seychelles' top 2019 goods exports to the EU were prepared or preserved fish (76.2% of total goods exports to the EU), yachts (16%) and frozen fish (6.3%) leaving Seychelles' commodity exports highly concentrated in these three product groups. Compared to 2012, exports of prepared or preserved fish decreased by -7.6% annually, while frozen fish products increase substantially by 76% annually (see Table 66 and Table 67).

In 2019, Seychelles' top 20 goods imports from the EU accounted for about 60% of the country's total goods imports from the EU. The EU's top 2019 export commodities in trade with Seychelles were frozen fish (excluding fish fillet; 29.5% of total EU exports to Seychelles), yachts and other vessels (5.2%) and other floating structures (4.4%). Compared to 2013, the year marking the beginning of tariff liberalisation in Seychelles, yachts and other vessels experienced significant export growth (20.2% annually). The highest annual export growth is registered for other floating structures (58.5%), tanks, casks, drums etc. (34.3%), electric accumulators (89.9%), refrigerators (26.2%), knotted netting of twine etc. (126.5%), and buttermilk (21.5%; Table 69 and Table 70).

Seychelles' commodity exports to non-EU jurisdictions partly mirror the country's commodity exports to the EU. Fishery products, yachts, cigars and miscellaneous agricultural products generally account for high shares in Seychelles' total goods exports to the rest of the world and neighbouring African countries. On the import side, Seychelles' goods imports are characterised by high shares of yachts, petroleum products, motor cars, various manufactured commodities, such as textiles, electrical and machinery equipment, and medicines (see Table 71 to Table 78).

Trade patterns Zimbabwe

In 2019, Zimbabwe's top 20 goods exports to the EU accounted for almost 100% of the country's total goods exports to the EU. Zimbabwe's top 2019 goods exports to the EU were diamonds (86.9% of total goods exports to the EU), cut flowers (3.6%) and other raw hides and skins (3.2%), leaving Zimbabwe's commodity exports to the EU highly concentrated. Compared to 2012, exports of diamonds increased by 3.8% annually. At the same time, available data suggest a strong decline in trade of cut flowers compared to 2009

(data is not available for the year 2012). While absolute trade volumes are generally low, the highest export growth rates are registered for various textiles products and tobacco products (see Table 80 and Table 81).

In 2019, Zimbabwe's top 20 goods imports from the EU accounted for about 65% of the country's total goods imports from the EU in 2019. The EU's top 2019 export commodities in trade with Zimbabwe were pharmaceuticals (13.4% of total EU exports to Zimbabwe), motor vehicles (9.4%), wheat (6.7%), and tractors (4%). Compared to 2017, the year marking the beginning of tariff liberalisation in Zimbabwe, pharmaceuticals experienced significant export growth (103% annually). High annual export growth rates are also registered for motor vehicles (53.2%), tractors (116%), insecticides (105.5%), mixtures of odoriferous substances (185.6%), milk and cream products (608.6%), trailers (152.3%), and machines for cleaning (333%), and other pharmaceutical goods (49.9%; see Table 83 and Table 84).

Zimbabwe's commodity exports to non-EU jurisdictions partly mirror the country's commodity exports to the EU. Raw materials, such as gold nickel, diamonds and platinum, as well as tobacco and other agricultural commodities generally account for high shares in Zimbabwe's total goods exports to the rest of the world and neighbouring African countries. On the import side, Zimbabwe's goods imports are characterised by high shares of petroleum products, pharmaceuticals, motor vehicles, chemical products, foodstuff products and various manufactured commodities, such as textiles, electrical and machinery equipment (see Table 85 to Table 92).

Other factors affecting trade

It is also key to consider the analysis of trade flows in the context of other factors affecting trade such as changes in commodity prices, natural disasters, and macroeconomic policies such as in particular exchange rate policies of ESA4 countries. **The exchange rate of Seychelles has stayed at a stable level over recent years, also due to its robust tourist presence.** Also, inflation remained at a low level of 2.6% in 2019. Also, the exchange rate of the Euro to the Mauritian Rupee has stayed relatively stable from 2012 to 2019 (with a EUR/MUR exchange rate of approximately 38 in early 2012 and a corresponding value of 40 in 2019). Also, the Seychelles Rupee has stayed relatively constant with a EUR/SCR exchange rate of 18 in early 2012 and approximately 15.5 in 2019.³⁴

In contrast, the Malagasy Ariary has experienced a constant depreciation since 2012 (EUR/MGA exchange rate of 2900 in January 2012 compared to above 4000 in 2019). Also, Zimbabwe has seen a local currency depreciation of the Zimbabwean Dollar especially in recent years (EUR/ZWD exchange rate in 2017 of 380 compared to 410 in 2019).³⁵ In Zimbabwe, this also contributed to rising inflation reaching 230% in July 2019. However, this rise in inflation is also due to rising food and agricultural commodity prices caused by a declining production of agriculture in Zimbabwe in recent years. Food security was also affected by natural disasters such as cyclone Idai in 2019 and drought conditions caused by El Nino.

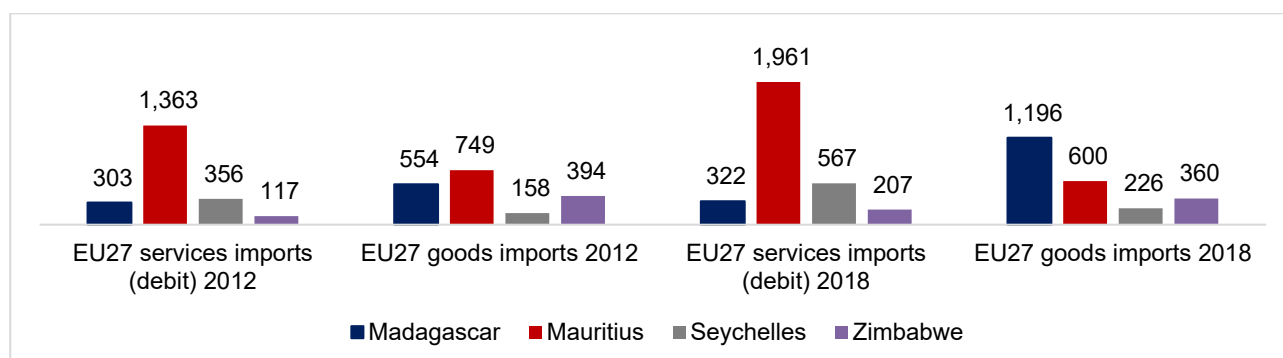
4.2 Patterns in ESA4 services trade

4.2.1 Patterns in ESA4 countries' services exports to the EU27

ESA4 countries' total services exports to the EU generally increased from 2012 to 2018, amounting to 322 million EUR for Madagascar in 2018, 2 billion EUR for Mauritius, 567 million EUR for Seychelles, and 207 million EUR for Zimbabwe. For Mauritius and Seychelles, services exports to the EU are significantly higher than goods exports, driven by these countries' strong tourism services exports (Figure 6).

³⁴ <https://www.xe.com/currencytables/>

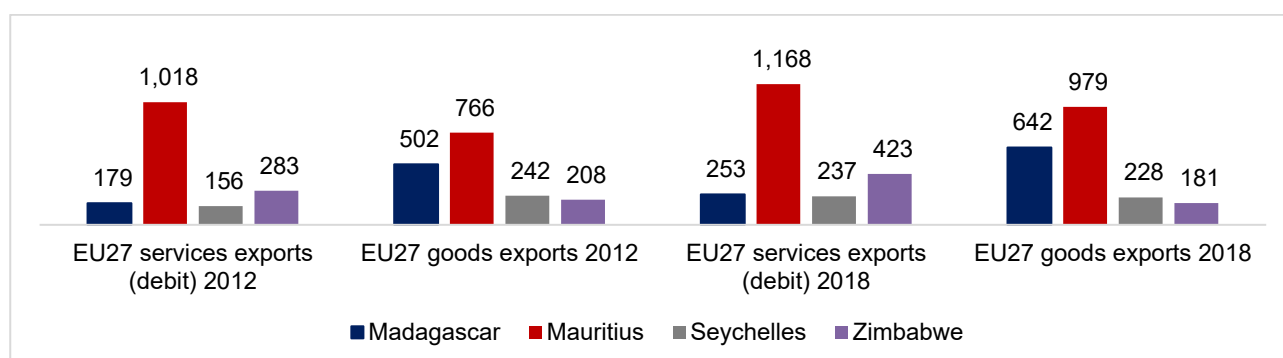
³⁵ <https://www.xe.com/currencytables/>

Figure 6: Development of ESA4 countries' total services exports to the EU27, 2012 and 2018, in million EUR

Source: Eurostat.

4.2.2 Patterns in ESA4 countries' services imports from the EU³⁶

ESA4 countries' total services imports from the EU generally increased from 2012 to 2018, amounting to 253 million EUR for Madagascar in 2018, 1.2 billion EUR for Mauritius, 237 million EUR for Seychelles, and 423 million EUR for Zimbabwe (Figure 7). For the EU, services exports to Mauritius and Seychelles are higher than goods exports.

Figure 7: Development of ESA4 countries' total services imports from to the EU27, 2012 and 2018, in million EUR

Source: Eurostat.

4.3 Foreign Direct Investment

EU27-ESA4 investment stocks have increased significantly in recent years. In addition, almost half of the current global gross direct investment flows in Mauritius originate in the EU. In 2018, stocks of EU FDI in ESA4 countries amounted to a total of 17.1 billion EUR. Individually, Mauritius accounted for by far the largest part with 15.7 billion EUR alone. Seychelles amounted to 778 million EUR, while the same figures were 366 million EUR for Zimbabwe and 268 million EUR for Madagascar.³⁷

In total, this is a significant increase from 2014 when EU FDI in ESA4 countries amounted to 13.1 billion EUR. ESA4 FDI stocks in the EU amounted to 10.3 billion EUR in 2018. This also constitutes a significant increase compared to 2014 when FDI stocks amounted to 6.3 billion EUR only (see Table 8).

³⁶ Balance of payments-based services trade statistics are only available at aggregate level for ESA4 countries' services imports from the EU. The latest year for which data is available is 2018.

³⁷ Note that investment activity in Zimbabwe is currently hampered by an uncertain economic situation, a lack of serious business climate reforms and missing foreign capital inflows. These factors currently limit the activities of foreign investors in the country.

Table 8: EU27-ESA4 FDI stocks (billion EUR)

	2014	2015	2016	2017	2018
Inward	6.347	5.128	10.143	8.078	10.310
Outward	13.137	14.364	1.448	17.785	17.119

Source: Eurostat

Due to data scarcity regarding detailed investment stock or flow data in the case of many ESA4 countries, the following analysis will lay a focus on Mauritius where more detailed data is available.

Mauritius can be regarded as a stable legal environment and has a reliable reputation when it comes to banking structures and its financial sector. These environmental factors also explain the relatively large level of EU FDI stock in Mauritius compared to other ESA4 countries. In 2019, global gross direct investment flows in Mauritius have been estimated at 536 million EUR. Real estate activities were the most important sector accounting for 405.3 million EUR, followed by financial and insurance activities (13.4 million EUR) and manufacturing (9.1 million EUR). Out of these total investment flows, close to half (240 million EUR) originated from the EU27, from France (accounting for 178 million EUR alone).

Mauritius' gross direct investment flows abroad accounted for 97 million EUR in 2019. The most important sectors were financial and insurance activities as well as accommodation and food service activities. Out of these total investment flows abroad, 32.4 Million EUR were directed to Africa and 5.6 million EUR were directed to the EU27.³⁸

4.4 EU's Outermost Regions and Overseas Countries and Territories

Out of the EU's nine outermost regions, La Réunion and Mayotte are near the ESA4 countries and are thus most impacted by the EPA. Stakeholders' views also indicate that La Reunion and Mayotte merit special attention regarding the EU-ESA interim EPA. It should be noted that, contrary to ESA countries, detailed UN Comtrade trade data are neither available for La Réunion nor Mayotte.

La Réunion's economy is largely focused on the services sector and some manufacturing activities. Also, agriculture plays an important role, in particular the sugar industry. Rum (alcoholic beverages) production is important. For the period 2013 to 2019, trade in goods data is provided by the Observatory for Economic Complexity (see Table 9 below). The data indicate that in 2019 La Réunion exported goods worth 127 million EUR, compared to 202 million EUR in 2013. In 2019, the top exports of La Réunion were Sugar (38.4 million EUR; 30.2% of total goods exports), waste not dangerous (17 million EUR; 13.4%), feeds for farm animals (10.5 million EUR; 8.3%), other manufacturing (9.39 million EUR; 7.3%), and alcoholic distilled beverages (5.21 million; 4%). In 2019, the top export destinations of La Réunion were Madagascar (18 million EUR), India (12.7 million EUR), Portugal (11.5 million EUR), Italy (11.4 million EUR), and Mauritius (11 million EUR). Sugar exports (mainly to the EU27 and the UK) declined from 66.7 million EUR in 2013 to 38.4 million EUR in 2019. Exports of feeds for farm animals slightly increased from 9.84 million EUR in 2013 to 10. Million EUR in 2019, with Madagascar being by far the most important export partner (92.8% in 2013; 97.4% in 2019).

Mayotte's economic activity is largely based on the agricultural sector, such as fishing and raising livestock. For the period 2014 to 2019, trade in goods data is provided by the Observatory for Economic Complexity. The data indicate that in 2019 Mayotte exported goods worth 4.8 million EUR, compared to 3.83 million EUR in 2013. In 2019, the top exports of Mayotte were tobacco products (1.83 million EUR; 32.2%), waste not dangerous (0.406 million EUR; 8.45%), other manufactured products (0.401 million EUR; 8.36%), and motor

³⁸ Bank of Mauritius. Preliminary Gross Direct Investment Flows: 2019. Available at: https://www.bom.mu/sites/default/files/di_2019q4_website.pdf. Calculated to EUR based on average exchange rate of 0.0251 EUR/MUR for 2019 (See: <https://www.exchangerates.org.uk/MUR-EUR-spot-exchange-rates-history-2019.html>).

vehicles (0.194 million; 4%). In 2019 the top export destinations of Mayotte were (Rest of the) World (2.51 million EUR; no country-by-country break-down available), Comoros (1.04 million EUR), India (407 million EUR), Madagascar (184 million EUR), and Mauritius (181 million EUR). The value of Mayotte's exports to ESA countries is generally relatively small. Madagascar and Comoros are major destinations for Mayotte's exports of manufactured goods, which remained relatively stable between 2014 and 2019.

Table 9: Development of major commodity exports from La Reunion and Mayotte

La Reunion	Commodity	2019 share	2019 trade value in million EUR	Major export destinations
2019	Sugar	30.20%	38.4	EU27: >90%
	Waste, not dangerous	13.40%	13.4	India (73.8%), Pakistan (9.78%)
	Feeds for farm animals	8.28%	10.5	Madagascar (97.4%)
	Other manufactured products	7.37%	9.39	Mauritius (61.8%)
La Reunion	Commodity	2019 share	2019 trade value in million EUR	Major export destinations
2019	Processed and preserved fish	32.50%	66.7	Vietnam (47.8%), Hong Kong (11.6%)
	Sugar	25.40%	51.3	EU27: >90%
	Waste, not dangerous	10.30%	20.8	India (59.9%), Indonesia (6.51%)
	Feeds for farm animals	4.87%	9.84	Madagascar (92.8%)
Mayotte	Commodity	2019 share	2019 trade value in million EUR	Major export destinations
2019	Tobacco products	38.20%	1.83	World (100%), not additional data available
	Waste, not dangerous	8.45%	0.406	India (96.1%)
	Other manufactured products	8.36%	0.401	Comoros (47.4%), Madagascar (15.4%)
	Motor vehicles	4.00%	0.194	Comoros (70.8%), Madagascar (20.8%)
Mayotte	Commodity	2019 share	2019 trade value in million EUR	Major export destinations
2019	Engines and turbines	26.90%	1.03	EU27 (Germany 91.8%)
	Other manufactured products	12.70%	0.486	Madagascar (18.2%), Comoros (13.7%)
	Waste, not dangerous	11.90%	0.453	India (68.4%)
	Other tanks, reservoirs and containers	10.90%	0.416	Mauritius (88.6%), Comoros (11.4%)

Source: Observatory for Economic Complexity

Available trade data indicate that the interim EPA had a negligible economic impact on Mayotte and La Reunion. For La Reunion, the drop of sugar exports to the EU is unlikely to result from higher exports (competition) from ESA countries as individual ESA countries' sugar exports to the EU declined significantly since 2012. Trade data provided by the Observatory for Economic Complexity for other OR's and OCT's suggest that the impact of the EU-ESA interim EPA on these regions is also negligible.

4.5 Role of other trade agreements

ESA4 countries have each also concluded several trade agreements with third countries on a bilateral basis or are beneficiary of preferences for example under the GSP. Annex VIII provides a more detailed overview of the regional agreements, GSP preferences as well as bilateral trade agreements for each ESA4 country. As outlined in the previous section covering preference utilisation, the PUR of the interim EPA by ESA4 countries has been consistently at a very high level (see chapter on RoO). Overall, the role that these other trade agreements with third countries have played for the use of the EPA with the EU can be considered to be limited.

5. Economic impacts

The European Commission's DG Trade undertook a set of modelling exercises based on a CGE model (for Madagascar, Mauritius and Zimbabwe) and a PE model (for Seychelles; due to data limitations). This chapter sets out the CGE modelling results for Madagascar, Mauritius and Zimbabwe and results for Seychelles, which are based on a PE model. The specifications are outlined in Annex III on research methods and analytical model. The modelling provides estimates for the impact of the EPA on trade flows and other economic variables against the counterfactual of not having an agreement in place. The baseline underlying the counterfactual includes MFN tariffs on the side of ESA countries and GSP, Everything but Arms (EBA) or MFN tariffs on the EU side. The models applied account for the dismantling of tariffs for the EU's ESA partner countries. The CGE model output includes changes in trade flows and domestic output for various product groups and services sectors, changes in aggregate GDP as well as the relative impact on welfare, prices, and wages at the macroeconomic level. The PE model output does not include macroeconomic effects, i.e. it does not provide estimates for GDP, wages and the aggregate price level.

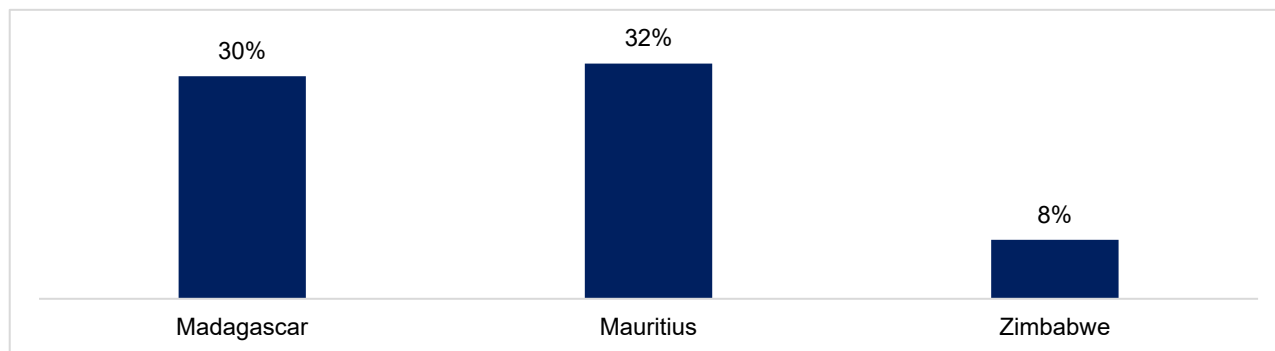
5.1 Modelling results for Madagascar, Mauritius, and Zimbabwe

EU exports to ESA states

As concerns total EU exports to ESA countries after the implementation of the EPA, **the largest percentage gains are estimated for Madagascar and Mauritius. Moderate percentage gains in imports from the EU are estimated for Zimbabwe.** With the EPA, EU total exports to Madagascar are estimated to be 30% higher, exports to Mauritius are estimated to be 32% higher and exports to Zimbabwe are estimated to be 8% higher (see Figure 8).

As concerns specific industries, **the EU's manufacturing sectors are estimated to benefit most from tariff reductions on the side of ESA countries**, with "Manufactures n.e.c." (which includes a wide array of high and less knowledge-intensive products), "Machinery and equipment" and "Other metal products" taking the lead (see Table 19). It should be noted that EU exports of "Wearing apparel" to Madagascar and Mauritius show high percentage increases too but compared to manufacture exports the absolute levels of apparel and other textiles' exports from the EU to ESA countries are low.³⁹

Figure 8: Projected changes in total EU exports due to the EPA



Source: DG Trade estimations.

³⁹ It should be noted that there is no policy change on services introduced to the simulations. Therefore, any effect on the sector would be second round, and thus very sensitive to the model's closure assumptions etc.

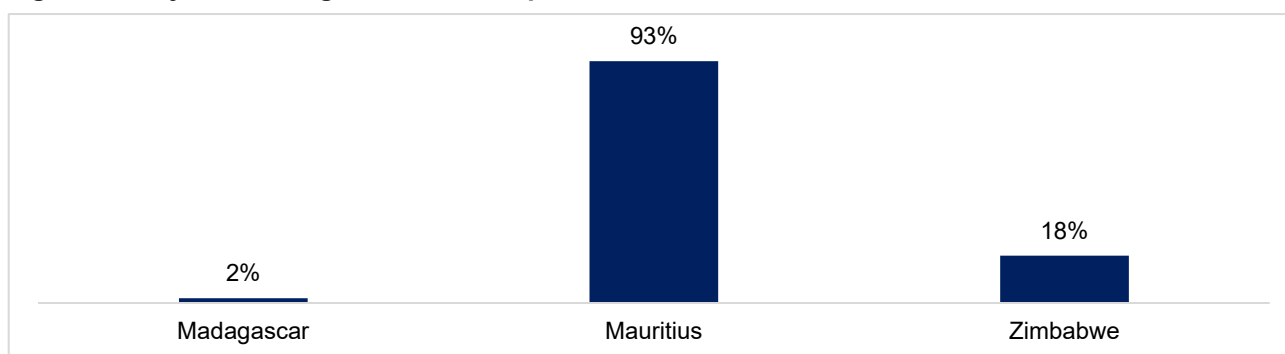
ESA4 exports to the EU

Mauritius and Zimbabwe are estimated to gain most relative export growth due to preferential market access in the EU. Madagascar's exports to the EU would largely remain unchanged in absence of the EPA. Total EU imports from Madagascar are estimated to be 2% higher with the EPA in place. By contrast, EU imports from Mauritius are estimated to be 93% higher and imports from Zimbabwe are estimated to be 18% higher with the EPA (see Figure 9).

ESA countries' agricultural and less knowledge-intensive (and less skill-intensive) manufacturing sectors are estimated to benefit most from tariff reductions (Madagascar, Zimbabwe) and MFN tariffs (Mauritius) respectively, with the highest relative changes estimated for exports of "Sugar and sugar crops" for Mauritius and Zimbabwe (see Table 20). It should be noted that the counterfactual export levels modelled for of sugar products' exports are comparatively low for both countries. It should also be noted that the counterfactual to the EPAs are not Cotonou preferences, but EBA, MFN and GSP for, Madagascar, Mauritius, and Zimbabwe respectively. In the sugar sector, preferences do not go beyond what was offered under Cotonou. Yet, sugar products' exports would be significantly lower without the EPA. Similar results are estimated for "Fisheries and processed fish", for which exports are rather negligible for Zimbabwe (the only land-locked country), but relatively high for Mauritius, when compared to other ESA countries and other commodities exported from Mauritius to the EU. Exports of textiles products from Mauritius and Zimbabwe to the EU are also estimated to be significantly lower in absence of an EPA. While the textiles and apparel sectors are rather negligible for the economy of Zimbabwe, it is of higher importance to Mauritius. For Mauritius and Zimbabwe "Other crops" industries are also estimated to benefit most from the EPA. This sector is of particular importance for Zimbabwe, accounting for a relatively high share in the country's overall exports to the EU.⁴⁰ By comparison, the "Other crops" sector is much less important to Mauritius' economy.

As concerns trade diversion at the expense of LDCs, goods and services exports to the EU are hardly affected by the EPA. LDC countries already benefit from duty-free, quota-free market access in goods markets. Some rather minor market distortions can be expected for the "Sugar and sugar crops" sector for which non-ESA LDC exports are estimated to decline by 5%.

Figure 9: Projected change in total EU imports from ESA



Source: DG Trade estimations.

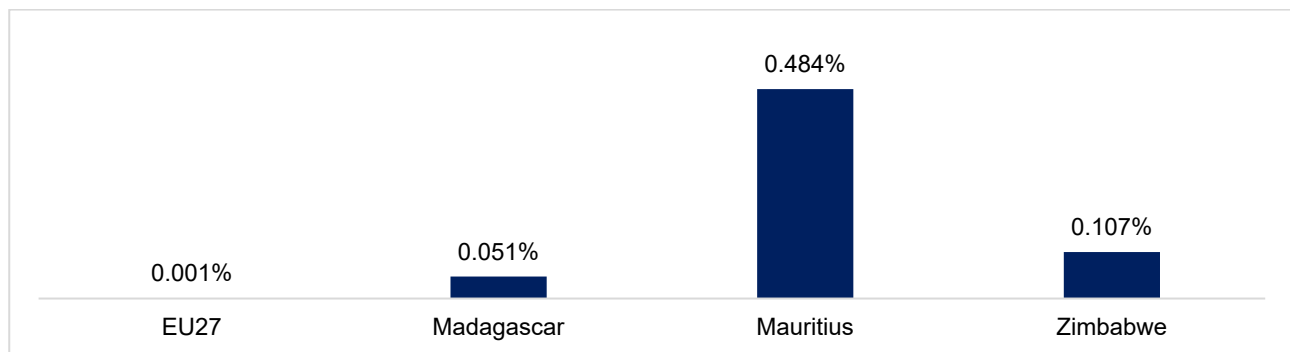
The impacts of the EPA are estimated to be relatively low, often negligible for most sectors of the economy when considering domestic sector output (overall production by domestic industries) in the EU and ESA countries (see Table 18). At the same time, Mauritius' sugar products production is estimated to increase by 52.1% due to the EPA with the EU, Mauritius' fishery and seafood sector is estimated to gain 10.2%, and Mauritius' textiles sector is estimated to expand by 6.3% ("Textiles") and 5.7% ("Wearing apparel") due to the EPA. Madagascar's "Non-ferrous metals" sector is estimated to export 5.2% more due to the EPA. For the EU and Zimbabwe, the EPA is estimated to result in relatively low changes in sectoral output. For

⁴⁰ Exports under this sector of Zimbabwe are mainly tobacco.

Zimbabwe, the highest percentage increases are estimated for the fruits and vegetables sectors (2.4%) and the sugar sector (1.4%).

These numbers are generally mirrored by the estimates computed for the countries' overall economic activity (economic output, GDP). **Importantly, no region experiences a reduction in aggregate economic output, which indicates that the EPA with the EU contributes to growth in ESA countries overall economic activity.** Due to its economic size relative to the trade at stake in the EPA, for the EU the impact of the EPA on overall economic output is overall negligible (but positive, see Figure 10). By contrast, Madagascar's overall GDP is estimated to be 0.05% higher due to the EPA. Mauritius' GDP is estimated to be 0.5% higher due to the EPA, and Zimbabwe's GDP is estimated to be 0.1% higher respectively.

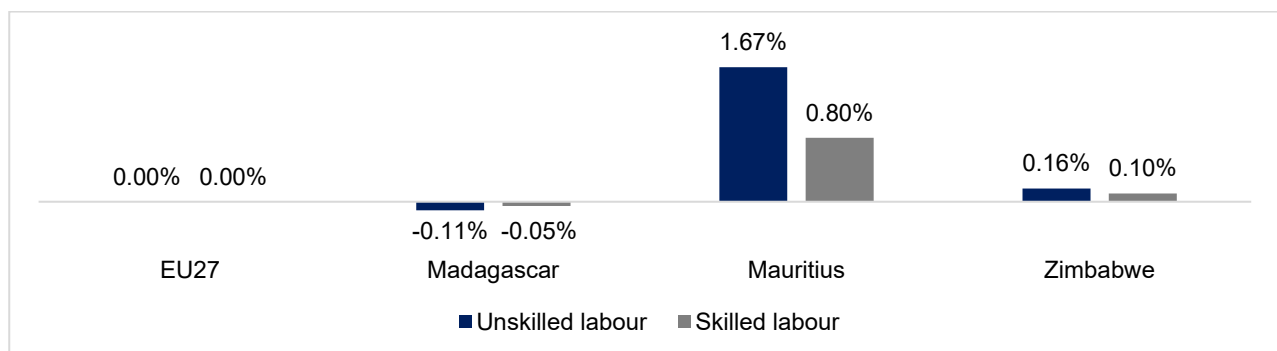
Figure 10: Projected change in aggregate GDP



Source: DG Trade estimations.

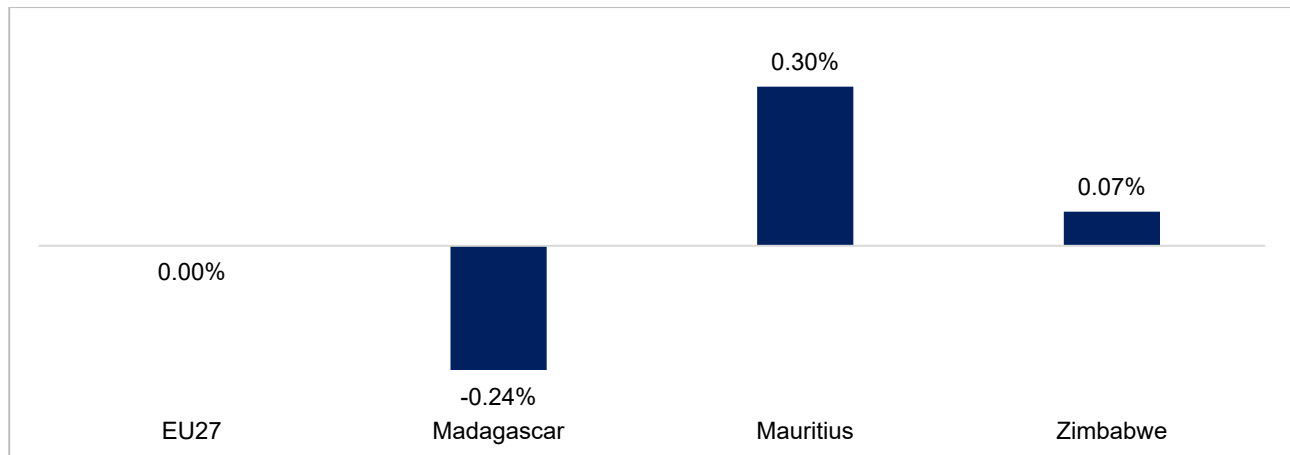
Similar to production and GDP effects, the impacts of the EPA on wages are generally negligible, with the exception of Mauritius (see Figure 11). For both skilled and unskilled labour wages in Mauritius' economy are estimated to rise by 1.7% and 0.8% respectively due to the EPA with the EU.

Figure 11: Projected changes in wages, skilled and unskilled labour



Source: DG Trade estimations.

As concerns effects on consumers, the estimates on the EPA's impact on consumer prices, can generally be considered as below the perception threshold, reaching from -0.24% for Madagascar to +0.3% for Mauritius (see Figure 12). Similarly, the effects on consumer prices for Zimbabwe are estimated at +0.07%, while no changes are estimated in the case of the EU27.

Figure 12: Changes in consumer prices, based on Fisher CPI

Source: DG Trade estimations.

5.2 Modelling results for Seychelles

The estimates from the PE model indicate that the EPA contributes to rising bilateral exports for both the EU and Seychelles. Table 21 and Table 22 outline the estimated changes in the top 20 post-EPA exports from the EU27 to Seychelles and from Seychelles to the EU27 respectively.

Total EU27 exports to Seychelles are estimated to be 26% higher compared to a no-EPA situation. Seychelles' total exports to the EU27 are estimated to be 573% higher compared to a no-EPA situation. While EU27 exports show relatively high increases in processed food and manufactured products, the significant increase in Seychelles' exports to the EU are driven by substantial increases in exports of "Prepared or preserved tunas, skipjack and Atlantic bonito". Accordingly, for Seychelles, the results show a very strong concentration of both current trade and preferential gains in one tariff line of processed fish, i.e. 160414 (tuna, skipjack and bonito). This line attracts tariffs of 24% or 25% ad valorem, which, for a weakly differentiated product such as fish, can be considered prohibitive. This trade would probably vanish in absence of the EPA. At the same time, it should be noted that economic activity, economic growth, and foreign exchange earnings in Seychelles reside very much in the tourism services sector, not in the commodity or low-tech manufacturing sectors, as is the case for other countries in the region.

5.3 Budgetary Impacts

Regarding budgetary impacts, the interim EPA has not had any significant negative impacts on overall tax revenue in ESA4 countries. Overall tax revenues have increased significantly for all ESA4 countries since 2019. Figure 22 in Annex IX shows overall tax revenues in current local currencies for Madagascar, Mauritius, Seychelles, and Zimbabwe. Tax revenues in Madagascar have increased consistently and at a strong rate since 2009 and a similar upwards trend can be observed in the case of Seychelles. In the case of Mauritius, tax revenues have consistently increased as well, except for a sharp decline in 2015. Available data for Zimbabwe also suggests an upwards trend since 2009.

When analysing annual tax revenue as a percentage of annual GDP, Figure 23 in Annex IX shows an overall constant level for all ESA4 countries from 2009 to 2019. Figure 24 illustrates annual revenues from customs and other import duties as a percentage of annual tax revenue. Here, we can observe a stable trend in the case of Mauritius where the revenue share remained at a constant low rate since 2009. For the other three ESA4 countries, an overall negative trend can be observed, in the case of Madagascar from 2009 to 2010. Also, annual revenues from taxes on income, profits and capital gains have remained relatively stable since 2009. In the case of Zimbabwe and Seychelles, an increase can be observed, while the shares of Madagascar

and Mauritius decreased slightly from 2009 to 2010 and then remained stable (see Figure 25). And the shares of annual revenues from taxes on goods and services even increased in the case of all ESA4 countries (see Figure 26).

Finally, annual labour taxes and contributions measured in percentage of commercial profits have remained constant as well in Madagascar, Mauritius and Zimbabwe from 2009 to 2019. In Seychelles, a strong decrease can be observed from 2010 to 2012, and the rate of taxes and contributions has remained at a constant low level since then (see Figure 27).

5.4 Key findings

Both the CGE modelling conducted for Madagascar, Mauritius and Zimbabwe and the PE model applied for Seychelles indicate that ESA4 countries benefit from the EPA through higher exports to the EU in commodities in which they tend to have international comparative advantages, mainly in agricultural commodities, processed food, textiles, and light manufacturing. Increased specialisation and improvements in the international division of labour cause a reallocation of domestic productive resources (labour and capital) to more productive uses, which causes domestic production to rise in Madagascar, Mauritius, and Zimbabwe, reflected by increases in these countries' real GDP (with EU GDP remaining largely unchanged). Similarly, for Seychelles, the PE estimates indicate that the EPA contributes to rising bilateral exports, which would also result in a reallocation of domestic resources and should translate to increases in real GDP.

6. Social, gender, human rights and environmental impacts

6.1 Overview

This section considers **the social, gender, human rights, and environmental impacts of the interim EPA** since the start of its provisional application in 2012 in Madagascar, Mauritius, Seychelles and Zimbabwe.⁴¹ Where available, quantitative data are presented from 2010 to 2019, using the years 2010 and 2011 as a baseline. This section provides an overview of the analysis; further details can be found in Annex X to this report.

The analysis considers the following channels through which the interim EPA could have had impacts on the environmental, social, gender and human rights development in the ESA 5 countries:

1. Provisions related to trade and sustainable development

The interim EPA does not have a dedicated chapter on trade and sustainable development, though it does have provisions in these areas, among which are the following:

- The Preamble of the interim EPA affirms that it 'shall be consistent with the objectives and principles of the Cotonou Agreement, which in turn calls for the respect of human rights and basic labour rights as well as the sustainable management of natural resources and the environment and moreover contains articles on gender issues, on trade and environment and trade and labour rights.⁴²
- The interim EPA also calls for coherence with the Millennium Development Goals (Art. 2), support for the implementation of international environmental agreements (Art. 49) and cooperation on natural resources, including water and biodiversity (Art. 38).
- The Agreement moreover identifies several social and environmental areas for development cooperation (Annex IV).

These provisions can have impacts in the ESA countries, though the screening suggests that as voluntary measures their effects may be limited (please see Annex X for further details). The analysis has looked at the role of support for the implementation of international environmental agreements, and of EU development cooperation more generally.

2. Trade provisions

The screening (see Annex X to this report) suggests that **trade provisions may have important indirect impacts on social, gender, human rights and environmental conditions** via the changes in trade and production they engender. For this reason, sub-section 6.4 looks at impacts in sectors which are marked by important trade flows with the EU.

3. Provisions on development cooperation

Several areas of environment and social and gender are mentioned in the Development Matrix of the interim EPA (Annex IV). EU development cooperation could thus have had a **direct impact** on these issues in ESA countries.

⁴¹ The analysis refers to but does not focus on Comoros, as this country fully joined the interim EPA in 2019. In addition, as indicated in the Terms of Reference for this study and agreed with the European Commission, the evaluation has not focused on possible impacts in the EU.

⁴² Partnership Agreement between the members of the African, Caribbean and Pacific Group of States of the one part, and the European Community and its Member States, of the other part, signed in Cotonou on 23 June 2000, Section 2 (Art.25-27), Section 4 (Art.31-32).

While the interim EPA has had a most likely small impact (see section 6.5) on the issues in question, a range of other policy initiatives – including other trade agreements and international labour and human rights conventions – along with domestic policy developments and international economic trends will also have had an effect in these spheres.⁴³ Consequently, while the analysis has sought to identify impacts related to the interim EPA, trends in environmental, social and human rights development in the ESA countries are influenced by the interplay of a broad range of factors.

This section first reviews the environmental context and trends in ESA countries, including policy developments, and then considers the context and trends related to social, gender and human rights issues. The section then considers trends in key ESA economic sectors that export to the EU. It concludes by drawing key findings concerning the impacts of interim EPA. The results are based mainly on literature review and desk research. While the research found data and information on the environmental, social, gender and human rights context in ESA countries, **a key data gap concerned information on the impacts of the interim EPA.** For example, the consultation activities provided little information on potential impacts.⁴⁴ To address this gap, the analysis looked more closely at key sectors exporting to the EU and used CGE modelling results to indicate potentially important areas where impacts may have occurred.

6.2 Environmental context and trends

Environmental challenges for the ESA5 countries include protection of biodiversity, forests and improving resilience to climate change. Four of the five ESA5 states are island nations (Comoros, Madagascar, Mauritius and Seychelles). They have shared characteristics including high vulnerability to climate change and extreme weather events and high importance of fishing as a sector. Together the four countries are part of the Madagascar and Indian Ocean Islands biodiversity hotspot, with high numbers of endemic species. Madagascar in particular is recognised as being of major importance for its biodiversity, in terms of both terrestrial and marine ecosystems.⁴⁵ Deforestation and degradation of forests and the marine environment due to human activity are therefore major environmental concerns for these countries.

Changes in environmental indicators related to biodiversity since the EPA has been provisionally applied are relatively limited. Forest cover in Comoros, Madagascar and Zimbabwe appears to have decreased slightly during the period since 2010. It has slightly increased in Mauritius and remained stable in Seychelles. The share of important terrestrial biodiversity sites protected has increased by a few percentage points in Madagascar, Mauritius and Zimbabwe. Deforestation can be linked to a range of human activity, including sectors relevant to trade with the EU such as agriculture or mining. However, in Madagascar, for example, studies suggest crops for trade are not among the main drivers of deforestation.⁴⁶ The four countries have very different levels of carbon dioxide emissions per capita: these are linked to income levels per capita as well as main fuel sources. **From 2012 to 2019, estimated carbon emissions from fossil fuel combustion have increased in Madagascar and Mauritius but declined in Seychelles and Zimbabwe (see Table 10).** When considering other sources of carbon emissions, including land-use change, emissions per capita are however estimated to have grown in all four countries.⁴⁷

⁴³ Moreover, the COVID-19 pandemic has had extensive impacts in 2020; it is not covered in this evaluation, which focuses on the period to 2019.

⁴⁴ In the survey that was carried out for the project, most respondents were from EU Member States, and most did not answer the questions on the environmental, social or human rights impacts of the interim EPA; moreover, the few that did mostly replied that they did not know about this topic. Nonetheless, one respondent from Mauritius saw moderately positive results in terms of environmental, social and human rights impacts. In interviews with civil society organisations in ESA countries, most had a low level of awareness of the interim EPA and thus of its possible environmental, social or human rights impacts, while in interviews with government and the private sector, environmental, social or human rights impacts were not among the main topics raised.

⁴⁵ Secretariat for the Convention on Biological Diversity (2020), Madagascar - Main Details, <https://www.cbd.int/countries/profile/?country=mg>

⁴⁶ Bureau national de coordination REDD+ (2017), Analyse des moteurs de déforestation et de dégradation dans les écorégions des forêts humides de l'Est et des forêts sèches de l'Ouest de Madagascar, https://bnc-redd.mg/images/documents/rapports/Rapport_final_MoteursdelaDeforestationetDegradationdesforets.pdf

⁴⁷ Global Carbon Project, <http://www.globalcarbonatlas.org/en/CO2-emissions>

Table 10: CO₂ emissions (metric tons per capita) from fossil fuel combustion, 2012 and 2018 levels

	Madagascar	Mauritius	Seychelles
2012	0.15	3	12
2019	0.16	3.41	10.98

Source: Knoema, based on JRC EDGAR⁴⁸

The CGE modelling undertaken by DG Trade suggests that changes in trade due to the interim EPA have had little impact on the carbon dioxide emissions of the signatories to the agreement. In fact, the modelling predicts that CO₂ emissions were slightly lower than they would have been in a scenario without the Agreement in Madagascar (-3.3%) and Mauritius (-2.6%). In Zimbabwe, emissions are predicted to have been essentially the same (a 0.03% increase is calculated) with the EPA than without.⁴⁹

Changes in flows of the volume of exports and imports and the type of transport used to move them can also affect the environmental impact of the interim EPA. **Data show an increase in the tonnes of exports arriving in the EU from Madagascar, Seychelles, and Zimbabwe by air over the period 2012-2019.** Considered as a percentage of the weight of all goods transported by sea, air, rail, or road, which are the four principal modes of transport, the share of goods arriving in the EU by air has increased from all four countries between 2012 and 2019.⁵⁰ Trends up to 2018 show a rising trend for all four countries, but 2019 saw a drop in the share of air transport for all except Seychelles.

For EU exports to these four ESA countries, there has been a 12% increase in the total weight of goods transported by air. However, as there has been an overall increase in exports by weight, and the proportion of goods transported by air in the total weight of all goods leaving the EU (by all means of transport) was slightly smaller in 2019 compared to 2012. Overall, it appears that, due to the rising quantities and shares traveling by air, **carbon dioxide emissions from goods transport between the EU and the ESA are likely to have risen.** The EPA may have influenced these trends; nonetheless, total emissions from goods transport are estimated to be far lower than national emissions in ESA countries.

Article 49 of the interim EPA notes that cooperation on natural resources and the environment will support the implementation of international environmental agreements, conventions, and treaties. The interim EPA moreover calls for development cooperation between the EU and the other signatories of the agreement covering areas important for environmental concerns, including management of natural resources and biodiversity and sectors such as mining, agriculture, fisheries, and energy.⁵¹ The development matrix in Annex IV of the Agreement includes addressing environmental impacts. **The five ESA countries have ratified a broad range of international environmental agreements**, including key agreements such as the Convention on Biological Diversity, the Paris Agreement on Climate Change, and the Basel Convention on Hazardous Waste. Nonetheless, a few agreements regarding fisheries and fish stocks have not been ratified by Comoros and Madagascar.⁵²

⁴⁸ Knoema, CO₂ emissions per capita: <https://knoema.com/atlas/Zimbabwe/CO2-emissions-per-capita>, based on JRC EDGAR emissions inventory and modelling: <https://edgar.jrc.ec.europa.eu/overview.php?v=booklet2020&dst=CO2pc>

⁴⁹ Changes were not calculated for Comoros, which joined the agreement only in 2019, or for Seychelles. The CGE modelling found that the change in the EU's CO₂ emissions was essentially zero.

⁵⁰ See Annex X for a graph showing the evolution of the trend for each ESA4 country over the period.

⁵¹ See Chapter IV of Interim Agreement establishing a framework for an Economic Partnership Agreement between the Eastern and Southern Africa States, on the one part, and the European Community and its Member States, on the other part, 2012/196/EC

⁵² Those not ratified include, notably: the Agreement for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea of 10 December 1982 relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks (1995); the Southern Indian Ocean Fisheries Agreement (2006). Zimbabwe has not ratified a number of marine fisheries agreements, but as the country is land-locked this is less relevant.

Information on implementation of multilateral agreements is not always easy to find. Concerning the Convention on Biological Diversity, all ESA5 countries have fulfilled their reporting obligations. Moreover, all have established or updated their national biodiversity strategies since 2012. Nonetheless, whilst all five countries are signatories to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), as biodiversity hotspots they are vulnerable to illegal trade in endangered species. For example, Madagascar is an important exporter of reptiles and amphibians as pets, and whilst there is legal trade for Malagasy species regulated under CITES, researchers have found that illegal trade in CITES Appendix I species has increased significantly and strongly impacted wild populations.⁵³ **Consequently, while all five ESA countries have taken steps to implement biodiversity conventions, important gaps remain.**

Moreover, all five ESA countries have ratified the UN Framework Convention on Climate Change as well as the 2015 Paris Agreement. **The ESA countries have taken a range of actions to address the greenhouse gas emissions and to adapt to climate change.** Madagascar's 2015 energy policy calls for the development of renewable energy and for reforestation to ensure fuelwood, which continues to be the country's main energy source. Mauritius set up a renewable energy agency in 2016. The countries have addressed climate adaptation: Zimbabwe, for example, launched a project on resilience in agriculture, co-financed by the Green Climate Fund.

A review of EU development cooperation projects in the five ESA countries has identified projects in key sectors that are cited in the interim EPA and that can have important environmental impacts. These include fisheries and agriculture projects, for example to develop more sustainable production techniques and to improve the climate resilience of these sectors. Several countries have also engaged in projects supporting the development of renewable energy; in the case of Mauritius, projects have supported the diversification of the sugar cane industry towards production of ethanol to be used as a renewable energy source. This is particularly relevant given the ceasing of the Sugar Protocol from 2009 that effectively reduced prices for Mauritian sugar, an important export.

A brief review of the support planned for the ESA interim EPA under the 11th European Development Fund Regional Indicative Programme for Eastern Africa, Southern Africa and the Indian Ocean found little mention of support for environmental objectives mentioned in the EPA.⁵⁴ Review of specific action documents for ESA countries to support the interim EPA found that where there are references to environmental objectives, these tend to be limited in scope.⁵⁵ Nonetheless, EU financing for multilateral environmental agreements (such as the Green Climate Fund under the UNFCCC) can also support policy developments and investment projects for environment and climate in ESA countries.⁵⁶

Overall, the main environmental impacts arising from the interim EPA appear to be linked to the scale of production and exports from ESA countries (including increasing exports sent to the EU via air). Since the provisional application of the EPA, it appears that ESA exports have remained concentrated in a few sectors, mainly commodities. Consequently, there has not been a major *composition* effect, as could occur if exports move to higher-value goods with lower impacts for the volume of trade. The information available hasn't identified changes in *techniques* that could lead to more efficient production of export products, though it cannot exclude that shifts are underway. A fourth dimension where the interim EPA could influence environmental impacts – and social, gender and human rights impacts – is via improvements in *governance*: the ESA countries have made progress in the implementation of key multilateral environmental agreements

⁵³ Janine E. Robinson, Iain M. Fraser, Freya A.V. St. John, J. Christian Randrianantoandro, Raphali R. Andriantsimanarilafy, Julie H. Razafimanahaka, Richard A. Griffiths, David L. Roberts (2018), 'Wildlife supply chains in Madagascar from local collection to global export', *Biological Conservation*, Volume 226, Pages 144-152, <https://doi.org/10.1016/j.biocon.2018.07.027>

⁵⁴ European Commission (2015), *Regional Indicative Programme for Eastern Africa, Southern Africa and Indian Ocean 2014-2020*, https://ec.europa.eu/international-partnerships/system/files/rip-ea-sa-io-signed-20150604_en.pdf

⁵⁵ See, for example, European Commission (2016) *Action Document for Zimbabwe EPA Support Project* https://ec.europa.eu/international-partnerships/system/files/c_2016_8091_f1_annex_en_4_zimbabwe_epa_support.pdf

⁵⁶ See also Annex X (Tables for Task 10)

and in the development domestic environmental policies. The assessment has identified examples of EU support for policy and programme developments, but a clear link to the interim EPA was not found.

6.3 Social, gender and human rights trends

Key trends in employment (including women's employment) in the ESA countries include the following (see Annex X for sources and further details):

- The **overall formal employment rates**⁵⁷ (including formal and informal employment) for the ESA5 countries show wide differences, ranging in the 2010-2019 from about 40% in Comoros to about 80% in Madagascar.⁵⁸ Moreover, national levels did not change notably after the provisional application of the interim EPA in 2012.
- Available data show that **informal employment** plays an important role in ESA countries, ranging from about 93% in Comoros (2014) to 14% in Seychelles (2019). There appears to have been an increase in informal employment since 2010, more accentuated for female employment, in particular in countries where agriculture is the main employer (as in Madagascar and Zimbabwe).
- While **agriculture** remains the main employer in Madagascar and Zimbabwe, there has been a slow **shift towards services** from 2010-2019, and employment in services increased from 20.6% to 26.8% in Madagascar and from 62.6% to 68.6% in Mauritius, though the increase in Zimbabwe has been much more limited. Tourism was a growing area for service sector employment.
- **Female employment** ranged from about 35% of the adult female workforce in Comoros to about 82% in Madagascar. Tourism has been a growing source of jobs for women in some countries. Overall, female employment has increased more than male employment.
- **Unemployment** is below 10% for all ESA countries, but higher for women than for men. While data are not complete, there appears to be an overall decrease of unemployment in the ESA countries over the time.
- **Average earnings** range greatly across ESA countries, with agriculture having lower average earnings than other sectors and services having higher average earnings. **Women's wages** remain lower across all sectors in all countries, and particularly in agriculture. However, average earnings for female workers in Mauritius rose from about 46% of the male average in 2011 to 55% in 2019, and some increases were seen in other ESA countries.

These employment trends are linked to a broad range of factors: national policies (supported to some extent the EU development cooperation), demand for goods from the EU and from other commercial partners such as China and the US, and political stability in the countries and global economic trends. **The ESA countries have made several actions to develop their social, labour and gender policies since 2012.** For example, while it had already ratified all fundamental International Labour Organisation (ILO) Conventions before 2012, Madagascar has ratified two additional ILO instruments in 2019 which are, among others, relevant to

⁵⁷ Employment rates are calculated as employment-to-population ratios expressing the number of persons who are employed as a percent of the total working age population. Employed persons include those in formal and in informal employment: 'Persons in employment are defined as all those of working age who, during a short reference period, were engaged in any activity to produce goods or provide services for pay or profit. They comprise employed persons "at work", i.e. who worked in a job for at least one hour; and employed persons "not at work" due to temporary absence from a job, or to working-time arrangements (such as shift work, flexitime and compensatory leave for overtime).' Employment in this sense includes all work for pay or profit, but excludes own-use production of services or goods, unpaid trainee work, volunteer work or other work activities that are not for pay or profit (see: ILOSTAT concepts and definitions, <https://ilostat.ilo.org/resources/concepts-and-definitions/> and ILO, Resolution concerning statistics of work, employment and labour underutilization, diagram 1, available at: http://www.ilo.ch/wcmsp5/groups/public/---dgreports/---stat/documents/normativeinstrument/wcms_230304.pdf)

⁵⁸ ILO data: https://www.ilo.org/shinyapps/bulkexplorer54/?lang=en&segment=indicator&id=EMP_2WAP_SEX_AGE_RT_A

combating child labour and forced labour,⁵⁹ both key social issues in the country: C189 on domestic workers and the 2014 Protocol to the 1930 Convention on Forced Labour. The instruments entered into force in Madagascar in June 2020.⁶⁰ Furthermore, in 2018, Madagascar amended its legal framework on child labour to prohibit the worst forms of child labour and in 2015 adopted a Code of Conduct for combating child labour in the vanilla sector.⁶¹ Zimbabwe's 2013 Constitution recognises and protects labour rights. Nonetheless, a range of problems have been observed since the provisional application of the interim EPA in 2012, as seen in complaints to the ILO's Committee of Experts on the Application of Conventions and Recommendations: these including anti-union actions (sometimes by applying violence), discrimination against women and child labour, in particular in low-income ESA countries.

The results of the CGE modelling for Madagascar, Mauritius, and Zimbabwe (and the PE model for Seychelles), undertaken by DG Trade, suggests that the overall impacts of the interim EPA have been limited, though positive, for both the ESA countries and the EU in terms of outputs, exports and imports and salaries. The modelling exercise suggest sugar cane in Mauritius, agriculture in Zimbabwe, fish processing Madagascar and Seychelles, and the textiles in Madagascar and Mauritius all benefitted compared to a scenario without an agreement. It should be recognised that CGE modelling involves a set of assumptions and mechanisms and their use has been questioned in particular when applied to developing countries whose trade is concentrated in a few sectors with a limited number of trading partners (in these cases, CGE models may underestimate the impact of trade liberalisation).⁶² Modelling results indicating increased output and trade in a sector may not, however, necessarily translate into increased employment or salaries for workers, or improved working conditions for those employed. Other factors, such as implementation and enforcement of international conventions, competitive pressures from the international markets, shifts in demands, external shocks can influence the levels and conditions of employment.

Human rights vary significantly across the five ESA countries, with Mauritius ranked among the highest countries in the world, while human rights in Madagascar and Zimbabwe have been affected by political and economic instability. **The countries have further developed their human rights policies since 2012,** Seychelles established a Human Rights Commission in 2018, and Mauritius has improved its institutional and policy framework aimed at accelerating the elimination of discrimination against women and promoting gender equality, by establishing a Ministry of Justice, Human Rights and Institutional Reforms in September 2017 and a national mechanism for reporting and follow-up in December 2017.

EU development cooperation has supported social, gender and human rights issues in ESA countries: it included, for example, support for women entrepreneurs and promotion of activities of young people and women working in export sectors in Madagascar; funds to empower low-income women, persons with disability and other vulnerable groups in Mauritius, focusing on women's empowerment; and support for civil society organisations and for disenfranchised and vulnerable groups in Zimbabwe (see Annex X and Chapter VIII).

The interim EPA, as an economic and trade agreement, can influence the right to an adequate standard of living: this right, and in particular the right to food, has been problematic, especially in Madagascar and Zimbabwe, which have both seen rising undernourishment and are at risk of famine. While both countries export crops to the EU, the evidence does not indicate that the interim EPA has contributed to their food crises or made food less affordable: for the most part, neither exports nor imports of staple foods with the EU are an

⁵⁹ Madagascar had already ratified the following instruments related to child labour: ILO C. 138, Minimum Age; ILO C. 182, Worst Forms of Child Labour; UN CRC; UN CRC Optional Protocol on Armed Conflict; UN CRC Optional Protocol on the Sale of Children, Child Prostitution and Child Pornography; Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children.

⁶⁰ <https://www.dol.gov/agencies/ilab/resources/reports/child-labor/madagascar>

⁶¹ Decree No. 2018-009 of 11 January 2018 amending and supplementing certain provisions of Decree No. 2007-563 of 3 July 2007.

⁶² For a review of the main issues related with the use of CGE models in EU trade policy, see Nilsson, L. (2018). Reflections on the Economic Modelling of Free Trade Agreements. *Journal of Global Economic Analysis*, 3(1), 156-186. doi:<http://dx.doi.org/10.21642/JGEA.030104AF> INTO REFERENCES

important item of trade.⁶³ The interim EPA also seeks to strengthen governance and the business environment, and doing so may have social and human rights impacts; while both governance and the business environment have improved in ESA countries, and EU development cooperation has provided support, there is not sufficient information to identify a direct link to social and human rights improvements (see Chapter 7).

A concern, raised for example by the UN Special Rapporteur on the Right to Food,⁶⁴ is that the removal of tariffs under agreements such as the interim EPA could lead to a loss of revenues for developing country governments, jeopardising public expenditure in areas related to economic, social and cultural rights, such as the rights to education and to health. **Recent data does not, however, show broad declines in ESA government expenditure on health or education as a share of GDP since the introduction of the interim EPA** (see Annex X for further details).

6.4 Focus on impacts related to key economic sectors

The influence of the interim EPA on social, gender, human rights and environmental conditions can be explored further by looking at ESA economic sectors that are major exporters to the EU. Table 93 in Annex X provides an overview of key issues in such sectors – please see Annex X for further details. The table provides indications of the interim EPA's impacts, drawing on information in the annexes, the results from the CGE modelling of changes in exports under the interim EPA compared to a scenario without the Agreement (for further information, please see Chapter 5) and the overview of EU development cooperation.

Among the issues identified, there have been reports of child labour in agriculture, including for export crops such as vanilla, tobacco and sugar produced in Madagascar and Zimbabwe. This appears linked to several factors, including extreme rural poverty. While it is likely that some products involving child labour have been imported to the EU, a direct link to the interim EPA was not found.

Social and human rights conditions in mining – including mica mining in Madagascar and diamond mining in Zimbabwe – have been a concern, along with the environmental impacts.⁶⁵ In February 2020, the European Parliament adopted a resolution on child labour in mines in Madagascar in which it urged the Commission to clarify that no minerals produced by child labour were imported into the EU.⁶⁶

A range of environmental impacts have been identified for major ESA exporting sectors, potentially including indirect deforestation pressures in Madagascar from vanilla production, water abstraction for tobacco cultivation in Zimbabwe and textiles production in Madagascar and Mauritius, and pressures on coastal zones and on fish stocks from fish exports from the island ESA countries.

EU development cooperation has addressed environmental, social and human rights issues in some key ESA exporting sectors, for example supporting restructuring in Mauritian sugar production. Concerning mining, Annex IV of the interim EPA includes the “promotion of health and safety standards” among the potential areas for development cooperation; however, a review has not identified any projects in this area.

6.5 Key findings

The review of the evidence gathered so far indicates that **the interim EPA overall has as yet not had major impacts on environmental, social conditions, gender and human rights conditions in ESA countries**. For example, the CGE modelling estimates that CO₂ emissions have decreased slightly in Madagascar and Zimbabwe compared to a scenario without the Agreement; exports in several ESA sectors have increased

⁶³ Madagascar exports a small volume of high-value rice to the EU but imports much larger volumes of rice, a main staple in the country, from Asia. Zimbabwe exports small volumes of vegetables (and also of coffee and flowers) to the EU, and it imports a small volume of wheat and meslin. Zimbabwe imports larger volumes of wheat and meslin, as well as rice and maize, from non-EU countries.

⁶⁴ UN Special Rapporteur on the right to food, ‘Report of the Special Rapporteur on the right to food, Jean Ziegler’ (10 January 2008) UN Doc A/HRC/7/5.

⁶⁵ These are also issues for gold mining in Zimbabwe: for further details, please see the case study on mining.

⁶⁶ European Parliament Resolution of 13 February 2020 on child labour in mines in Madagascar (2020/2552(RSP)).

according to the modelling, and these may have led to small improvements in employment and wages in these sectors as well as for the economy as a whole.

The countries have made some policy and institutional reforms: while progress and actions have varied, there thus have been improvements in governance. The EU has provided support in a number of areas through its development cooperation, though strong links between national reforms, EU development cooperation, the Agreement itself and environmental, social and human rights conditions were not found. Positive examples include EU support for restructuring and innovation in the sugar sector in Mauritius. On the other hand, in Madagascar and Zimbabwe, it appears that political and economic instability has been a major factor shaping social and human rights conditions.

Concerning environmental impacts related to the interim EPA, these mainly appear linked to the scale of EU exports. Major *structural* effects linked to a diversification of exports have not been identified (indeed, Chapter 5 indicates that there has been greater concentration of exports to the EU rather than a diversification). The analysis did not find information on improvements in *environmental management techniques* or *governance* leading to reduced environmental impacts, though actions under the interim EPA as well as the SFPAs to better regulate fishing may lead to such results (see the case study on fisheries).

The review of major exporting sectors has identified important ongoing environmental, social, gender and human rights concerns. These include concerns over social conditions in *agricultural sectors* with major exports to the EU, including vanilla produced in Madagascar and tobacco in Zimbabwe. While low salaries and instances of child labour and cases of disrespect of labour rights (see above) are not specifically a direct result of trade with the EU, these issues are a concern for sectors exporting to the EU. Concerns over labour conditions have been raised in manufacturing sectors, such as the production of *textiles* in Madagascar. In this sector as well as others including agriculture, *women* appear to be more adversely affected. Increased production in this sector can also increase water consumption and water pollution. There are strong social, human rights and environmental concerns linked to *mining* in Madagascar and Zimbabwe. In sum, social, gender and human rights concerns in these sectors have continued under the interim EPA. The information available hasn't identified a strong link between the introduction of the interim EPA and changes in these sectors, though EU development cooperation has sought to strengthen governance. These concerns nonetheless indicate key areas where further policy action is needed.

7. Horizontal effects on governance and business environment

The topics of governance and the business environment are closely linked; nonetheless, this section focuses on each separately. The first paragraphs review provisions of the interim EPA for these two topics. The section then looks at international measures of governance and of the business environment in the five ESA countries. As development cooperation is a key mechanism under the interim EPA to address both, the section then briefly reviews cooperation projects and programmes in these areas.

The interim EPA has few provisions on *governance*.⁶⁷ As a general objective, the Agreement calls for improving “good governance in the ESA region” (Art. 2(b)), along with regional integration and economic cooperation; however, this objective isn’t directly accompanied by implementing provisions. The Agreement identifies governance as an area for technical assistance in the Development Matrix (Annex IV), including in the following three areas: “Technical assistance for exchange programmes and capacity building on water governance...” (area 1(d)(iii)); “...institutional governance to facilitate faster implementation of customs administration and procedures to meet emerging security requirements.” (area 3(a)(vi)); and improved governance for trade facilitation (area 4(b)).

It is expected that the negotiations on deepening the EPA will devote further attention to governance, as the Rendezvous clause (Art. 53(i)) identifies “cooperation and dialogue on good governance in the tax and judicial area” as one of the areas for negotiation for a full and comprehensive EPA.

The interim EPA contains several provisions related to the *business environment*. Its general principles include:

- “establishing and implementing an effective, predictable and transparent regional regulatory framework for trade and investment in the ESA region...” (Art. 2(f))

The development of the regulatory framework is also a provision mentioned in articles concerning fisheries, ICT, natural resources and environment. Moreover, Annex IV identifies the regulatory framework as a potential area for development cooperation for these areas and also for energy, agriculture, mining and regional economic cooperation. The development framework also refers to “strengthening of judicial security and legality” for private investment, commercial laws, employment laws, foreign investments, consumer rights and intellectual property rights (area 4(d)). In addition, the Development Matrix includes the following areas for potential cooperation:

- “Support policy development (of business-friendly laws and regulations)” (area 5(a)), including reviews of business and commercial laws
- “Establish mechanisms to encourage Public Private Partnerships and Community Private Partnerships” (area 5(b))

Negotiations for the deepened EPA are expected to address the business environment: among the topics included in the Rendezvous clause are, for example, “cooperation and dialogue on good governance in the tax and judicial area” (Art. 53(i)). **Consequently, the interim EPA sets out development cooperation as a**

⁶⁷ While the interim Agreement does not define governance, several international organisations have done so. A report of the African Union, referring to UN work, sets out the following components of good governance: “...legitimacy, whereby the government has the consent of the governed; accountability that ensures transparency and answerability for actions; respect for law and protection of human rights; and competence, which consists of effective policy making, policy implementation and service delivery”. See: African Union, *The Africa Governance Report: Promoting African Union Shared Values* (Prepared by the African Peer Review Mechanism in collaboration with the African Governance Architecture), January 2019, available at: <https://au.int/sites/default/files/documents/36418-doc-eng- the africa governance report 2019 final-1.pdf>

key mechanism to support ESA countries for the development of both governance and the business environment.

7.1 Overview of country developments on governance

The World Bank's most recent indicator scores⁶⁸ for the five ESA countries, presented in terms of the global percentiles, are shown in Table 11 below: these scores are *relative*, as they present a national ranking in comparison with other countries in the world. The scores vary widely across the countries and across the dimensions of governance. For the two higher-income ESA countries, Mauritius and Seychelles, almost all scores are in the top five percentiles globally, while in the three lower-income countries, the scores are in lower percentiles.

Table 11: Governance indicators for the five ESA countries (2019): global ranking (percentile)

	Comoros	Madagascar	Mauritius	Seychelles	Zimbabwe
Voice and Accountability	28.08	37.93	73.40	58.13	16.75
Political Stability / No Violence	41.90	37.62	74.29	69.05	14.76
Government effectiveness	3.85	12.02	77.88	71.15	10.58
Regulatory quality	10.58	22.60	79.33	49.04	6.25
Rule of law	12.50	15.87	76.92	59.13	8.17
Control of corruption	15.38	15.87	63.94	81.25	10.10

Source: World Bank, Worldwide Governance Indicators, available at: <https://info.worldbank.org/governance/wgi/>

Note: The scores present a ranking among countries across the world on a score of 0 to 100

Since 2010, while trends have varied, the five ESA countries have generally seen improvements in terms of their ranks: their scores for voice and accountability, political stability, government effectiveness and regulatory quality have risen in most of the countries. It should be noted that these scores represent global rankings, with large uncertainties.

The African Development Bank has made a Country Policy and Institutional Assessment (CPIA) for 37 countries, including three ESA countries (Comoros, Madagascar and Zimbabwe). These scores cover six areas: governance, economic management, structural policies, infrastructure and regional integration, and social inclusion and equity. The three ESA countries all score below the African average. While Comoros and Zimbabwe have seen small improvements in their overall CPIA scores between 2004 and 2018 (the years for which data are available), for Madagascar there has been a small decline.

Country policy developments have been reviewed in other parts of this report (including section 6 above). These show a range of policy developments: for example, their environmental policy actions have included the development of new national biodiversity strategies, climate adaptation projects and other actions.

⁶⁸ For over two decades, the World Bank has presented annual indicators across six governance dimensions, based on work carried out by research institutes, NGOs and other organisations. The World Bank notes that each national score is subject to a wide range of uncertainty. In addition, there is an open discussion on the accuracy of these indicators

7.2 Overview of developments in the business environment

One measure of the business environment is the Economic Freedom Index published by the Fraser Institute. This index is based on a range of measures, including government consumption, income tax rates, judicial independence, inflation rate, capital controls and regulatory burden. As for governance, the results provide scores that synthesise complex national situations and thus are open to discussion and interpretation. An overview of the scores for four ESA countries is presented in Table 12 (the index is not calculated for Comoros).

These four countries vary significantly in terms of their scores, with Mauritius ranked seventh in the world in terms of economic freedom, ahead of all EU Member States, while Madagascar and Zimbabwe were ranked in the fourth quartile globally. From 2012 to 2018, scores have improved in all of these countries except Madagascar, where the absolute score fell slightly, and the country's rank fell from the third to the fourth quartile globally.

Another global index provides broadly similar results. The World Bank's Doing Business index ranks Mauritius as the 13th highest country in the world, while Comoros, Madagascar and Zimbabwe all rank in the lower half of global economies in 2020. In this index, however, Seychelles ranks 100 out of 190 countries, so also in the lower half. For this index, comparative rankings across the decade are not available.

Table 12: Economic freedom index for four ESA countries (2018 and 2013)

	Madagascar	Mauritius	Seychelles	Zimbabwe
Index (2018)	6.20	8.21	7.49	5.21
Quartile (globally, 2018)	4	1	2	4
Index (2012)	6.37	7.97	7.29 *	5.08
Quartile (globally, 2012)	3	1	2 *	4

Source: Fraser Institute, *Economic Freedom* (data from the *Freedom of the World: 2020 Annual Report*). Available at: <https://www.fraserinstitute.org/economic-freedom/map?geozone=world&page=map&year=2018>

Notes: The index is not calculated for Comoros. 2012 data not available for Seychelles, and 2013 data used

7.3 Evidence of the interim EPA's impact

While international measures of governance and the business environment have shown some improvements since 2012, the interim EPA was only one of several influences, as internal political and social developments and cooperation with other countries and with international organisations would have been among the influences. Nonetheless, the interim EPA calls for development cooperation in several areas related to governance and the business environment. A review of development cooperation programmes and projects (see Chapter 8 and Annex XI) has identified several relevant actions. These include the following:

Governance:

- Improving public financial management and transparency in Comoros
- Strengthening good governance, including public finance management, accountability and transparency in Zimbabwe
- Supporting government reforms and policy strategies in Madagascar

Trade facilitation:

- Regional Trade Facilitation Programme, to increase intra-regional trade in goods and services
- SADC Trade Facility Programme 2019-23, to strengthen capacities for simpler customs procedures and reduce non-tariff barriers

- Support to enhance Zimbabwe's integration into the regional and international trading system

Business environment:

- Support to improving the Investment and Business Environment in the SADC region 2019-2024, EUR 14 Million, to strengthen the investment policy framework, integrate financial markets and improve financial inclusion for local businesses and SMEs
- Assistance to put in place a comprehensive framework on intellectual property in Mauritius, and work to improve the business and investment climate in this country

Development projects have supported other aspects of governance, including civil society participation, for example in Madagascar and Zimbabwe.

7.4 Key findings

Both governance and the business environment vary greatly across the five ESA countries, and international indicators give higher scores to the higher income countries. For both areas, international indicators show some improvements in ESA countries since the negotiation of the interim EPA.

While the influence of the interim EPA is difficult to discern, the agreement calls for development cooperation to support governance and the business environment in the ESA countries. A review has shown that relevant development projects and programmes implemented since 2012, both at a regional scale and for individual countries, have sought to strengthen aspects of governance and improve key areas of the business environment in the five ESA countries. Thus, EU action is linked to *outputs* in the areas of governance and the business environment, and it is likely that it also has influenced in terms of *outcomes* within the countries.

8. Development cooperation

8.1 Development cooperation commitments of the EPA

EPAs provide preferential and reciprocal market access to the EU market for the African, Caribbean and Pacific group countries and to ACP markets for the EU. To support the African partners in their efforts to generate the full benefits of the EU-ESA5 EPA, the EU and ESA countries agreed on areas for development cooperation, which the EU grants generally through the EDF. The objectives of development cooperation within the EU-ESA5 interim EPAs are the enhanced competitiveness of ESA economies as well their structural adjustment.⁶⁹ These objectives are to be met by focusing on the following themes (1) infrastructure development, (2) productive sectors, (3) regional integration, (4) trade policy and -regulations, (5) trade development, (6) adjustment cost and (7) institutions. These are laid out in a toolkit labelled the Development Matrix (Annex IV of the interim EPA) that defines key areas, objectives and illustrative activities.⁷⁰

This Chapter is based on the analysis of internal country fiches of the European Commission (DG DEVCO) about EU Development Cooperation with ESA5 countries as well as about 45 country-specific (Annex XI) and more than 15 regional development programmes (Annex XII) within the EDF. We also refer to the stakeholder consultations, which only occasionally mention specific programmes, but give a good general impression about the development cooperation within the EPA.

To summarize this chapter, the development component of the interim EPA contributed to these objectives.

8.2 Development assistance to ESA5 partner countries

8.2.1 *The European Development Fund as the main instrument*

The development assistance to ESA5 nations designed to help implement the interim EPA takes place mainly within the framework of the EDF. They have been introduced as an instrument of development cooperation with the founding of the European Economic Community in 1957; the first EDF started in 1959. An EDF ensures grants for development actions in the framework of the Cotonou Agreement between the ACP countries and the EU Member States. They are designed to promote the economic, cultural and social development of the ACP States with a view to contributing to peace and security and promoting a stable and democratic political environment. In addition to the ACP countries, the EU Overseas Countries and Territories (OCTs) are included in the EDFs; they receive about 1.2 billion Euro of the 11th EDF.⁷¹ Needless to say that the ESA5 countries receive only parts of these funds.

An EDF programme is a multi-annual programme. The two relevant EDFs to be considered for the evaluation within the EU-ESA5 interim EPA are the 10th programme, lasting from 2008-2013, and the 11th EDF (2014-2020). The 10th EDF activated almost 24 billion EUR, whereas the 11th EDF offers total funds of 31.6 billion EUR (EPRS 2014). Although the 11th EDF coincided with the period of the multi-annual financial framework, it is managed as a separate fund not covered by the EU budget (Gavas 2012, p.4).

Herrero et al. (2015) as well as EPRS (2014) give a detailed account of the functioning of the 11th EDF. The programme is co-managed by the EU and the recipient country that appoints a National Authorizing Officer

⁶⁹ European Council (2012, Chapter IV) For the general objectives of the EPA, see Inception Report of the SIA in Support of Negotiations with ESA5 TRADE 2019/D2/D09: http://research-sia-esa.eu/wp-content/uploads/2020/10/SIA-in-support-of-negotiations-with-ESA5_Final-inception-report.pdf, p. 10-12.

⁷⁰ European Council, 2012, Annex IV. Unfortunately, this development matrix is not picked up in the development programmes set up to support the readiness of ESA5 countries for the interim EPA.

⁷¹ OCTs are 13 countries and territories with close connections to: Denmark, France and the Netherlands. They do not belong to the single market. Thus, obligations imposed on third countries in respect of trade, particularly RoO, health and plant health standards and safeguard measures, also apply to them. This distinguishes them from Outermost Regions (OM).

(NAO) to run the process. **On the EU's side, the network of EU Delegations (EUDs) in the respective partner countries plays a crucial role, closely cooperating with European External Action Service (EEAS) and DG DEVCO.** In order to make the programme within the EDF workable, the EU is allowing a 5% share of administration costs. Although it had been discussed, the EDF does not foresee graduation, meaning that countries who grow into the middle-income country will still participate in the EDF programmes. Nevertheless, in the period of 2010-2012, LDCs received 56% of the payments (EPRS 2014, p. 17).

About 84% of the budget is dedicated to supporting National Indicative Plans (NIPs). These contain emergency reserves as well as an incentive mechanism for reforming countries. An additional 12% are dedicated to intra-ACP and inter-regional cooperation, and 4% are reserved for investment facilities. A recipient country has to sign an NIP with the EU, which identifies three sectors to focus on. The disbursement of the funds can be either on a project basis, as budget support (following certain criteria) or as sector support, which also is directed at private actors. Internal and external auditing and monitoring processes are applied, which have a good reputation (EPRS 2014, p. 15 and 18ff.).

The EU is supporting the ESA5-countries in the framework of different other programmes, mostly organised in regional clusters, mirroring the Regional Economic Communities (RECs). For the ESA5 group, these include COMESA, SADC and the Indian Ocean Commission (IOC), which acts as a signatory for several African regional economic communities (RECs) with the EU.⁷² Flagship projects are Smartfish (37 million EUR), ISLANDS (17.5 million EUR) and the Regional Integration Support Programme (RISP, 6.15 million EUR). It is also foreseen to use joint programming (JP) of EU members engaged in ESA5 and the EU; which, however, is not used in all five countries. Finally, each of the ESA5 countries receives a grant of 10 million EUR (Comoros: 6 million EUR) for the implementation of the EPA in 2020.

8.2.2 *Development Assistance for Individual ESA5 Countries*⁷³

In this sub-section, we briefly introduce the development assistance programmes relevant to the effectiveness of the interim EPA that the EU has agreed upon with individual ESA5 countries.

In the 10th EDF, Comoros received 60.65 million EUR (10.5 million EUR in the B-envelope for unforeseen emergencies). In the A-envelope of the 10th EDF, Comoros received for Infrastructure and transports 27 million EUR, education 11.25 million EUR, non-focal sectors 6.75 million EUR and others (incl. MDG Initiative) 5.23 million EUR. Within the 11th EDF, Comoros' NIP concentrated on three areas, namely good governance, infrastructure, mainly roads, and technical vocational education training. Because of a low absorption capacity for funds, not all funds could be utilised in the foreseen time. Accordingly, the country is eligible to receive for the following payments: good governance 17 million EUR, education vocational training 10 million EUR, sustainable transport 36 million EUR and support measures 5 million EUR.

In addition, Comoros is supported through regional initiatives, in particular by the Regional Integration Support Mechanism (RISM) within COMESA, the Smartfish programme of the IOC as well as ISLANDS to support Small Islands Developing States (SIDS). It receives 6 million EUR for EPA implementation in 2020 as well as support for its accession to the World Trade Organization (WTO) and the interim EPA. Comoros benefits from the thematic budget line: Climate Change (3 million EUR), Energy Facility (2.3 million EUR) and civil society organization (2.3 million EUR). France as the only member state present in Comoros and the EU agreed on JP.

Madagascar was allocated 588.2 million EUR in the 10th EDF but only received 303.61 million EUR until end of 2013. The funds were allocated as such: infrastructure and transport 72 million EUR, rural development:

⁷² These programmes and the funds dispersed through the EDF are not always easy to disentangle; see also European Commission (2021, pp.39ff).

⁷³ This subsection is based on internal country fiches of the European Commission (DG DEVCO) about EU Development Cooperation with Comoros (31.01.2020), Madagascar (03.02.2020), Mauritius, Seychelles and Zimbabwe (21.0.2020 respectively). More details can be found there. We also consulted the 2019 and 2020 Annual Information Sheet in the Implementation of the Interim EPA between the EU and ESA States respectively as well as European Commission (2020).

63 million EUR, out of concentration 112 million EUR, TCF 8 million EUR and the B-envelope 48,61 million EUR. The country signed the NIP for the 11th EDF in 2015. It focuses on governance, infrastructures and rural development. In addition, there are funds available for the civil society and the NAO and the Technical Cooperation Facility (TCF), in detail: governance 145 million EUR, infrastructures 230 million EUR, rural development 132 million EUR, civil society support 5 and TCF and NAO support 7.4 million EUR.

The country received additional funds to repair the road network after a cyclone in 2017 within the B-envelope. **It benefitted from participating in regional programmes such as Smartfish, EcoFish (28 million EUR) and programmes for maritime security, different EU facilities for water and energy as well as intra-ACP programmes.** Within RISM, Madagascar was encouraged to reduce tariffs and non-tariff measures (NTMs). It has received funds within thematic budget lines, among them the Sugar Protocol (4.5 million EUR), environment (3 million EUR), climate change (8 million EUR), the European Instrument for Democracy and Human Rights (EIDHR). It receives 10 million EUR for EPA implementation in 2020 within PADEIR, and an additional 12 million EUR in support of its trade capacity: 7 million EUR for the Business Climate Programme and 5 million EUR for supporting young entrepreneurs. In addition, the European Investment Bank (EIB) is engaged in multiple projects. Although member states are active in Madagascar, no JP takes place.

Mauritius was assigned 76.6 million EUR within the 10th EDF in form of general budget support (51.6 million EUR), support to non-state actors (NSA, 10.6 million EUR) and TCF (2 million EUR). In addition, 12.4 million EUR were assigned to the B-envelope. In the 11th EDF, Mauritius has received 7.9 million EUR for health budget support (as a response to Covid 19) and 2 million EUR for TCF. It has met its commitment under the NIP in 2018. Mauritius receives 10 million EUR for EPA implementation in 2020. Moreover, Mauritius is eligible for support under regional programmes and receives support from the Africa Infrastructure Trust Fund (AITF), e.g. for the extension of the container terminal of the Mauritius Port Authority, for the restructuring of Cargo Handling Corporation Ltd. and for the extension of the airport of Rodrigues (loan plus grants of 20.2 million EUR in total). Thematic budget lines support among others migration policy, climate policy, restructuring of the sugar cane sector (278 million EUR between 2006 and 2013), funds for civil society organizations (CSO), with the aim of empowering women, and research in agriculture. The EIB is active in a number of infrastructure projects, no JP takes place.

The EU supported Seychelles with 20.6 million EUR within the 10th EDF, of which 7.5 million EUR were dedicated to general budget support, 3 million EUR to education, 0.9 million EUR to governance and 9 million to the B-envelope. In the 11th EDF, the EU assigned 2.2 million EUR to support measures. An NIP was signed for both programmes, JP is not planned. In addition to the EDFs, the EU supports Seychelles in regional programmes including Smartfish as well as programmes for maritime security and ISLANDS Thematic budget lines included climate change (3 million EUR) and social and human rights support of about 0.4 million EUR. The EIB is participating in several infrastructure projects, including submarine cables and the renovation of Port Victoria.

The support for Zimbabwe is barely trade-related but focused on health, agriculture, social aspects and the B-envelope. Within the 10th EDF, the EU committed to 158.3 million EUR for the B-envelope. The NIP for the 11th EDF was difficult to agree upon. The EU granted 126 million EUR for health, 103 million EUR for agriculture, 45 million EUR for governance, 6 million EUR for civil society as well as 7 million EUR for budget support. Additional ad-hoc payments in the B-envelope summed up to 30.5 million EUR. Zimbabwe receives 10 million EUR for EPA implementation in 2020, but no further regional funds, mainly directed at smoother customs clearance and improvement of SMEs' competitiveness and export capacities. Thematic budget lines concentrated on social and human rights aspects as well as wildlife conservation. Member countries are interested in JP; the EIB has not been present in Zimbabwe for 20 years.

8.3 Impact assessment of EU Development Assistance for ESA5: An overview

8.3.1 A general assessment of the 11th EDF

First, we offer an overview of the programmes' impact.⁷⁴ The European Commission (2017) judges that the EDF programming was **relevant**, as it responded to the recipient countries' needs. Poverty reduction, attaining the SDGs and aid effectiveness were key objectives. Herrero et al. (2015) see the concentration on low-income countries (LICs) and least developed countries (LDCs) as positive and add that the so-called policy-to-practice gap has been reduced under the changes governance of the 11th EDF. Concerning **effectiveness**, Herrero et al. (2015) assess the sector concentration policy as successful. The European Commission (2017) argues that effectiveness is principally high, and the goals are mostly achieved. However, this depends on the ACP countries' willingness and ability to pursue institutional reforms. In addition, Herrero et al. (2015) argue that effectiveness is potentially reduced by a long programming process, the top-down approach of the EDFs in principle, and a relative low connection between joint programming and EU bilateral programmes. This aspect is directly connected to a central theme of the EU-ESA5 partnership, namely **governance**. The European Commission (2017) sees potential for institutional reform. **Efficiency** of development assistance is very difficult to measure. Neither of the studies uses an econometric model to test for the efficiency. The European Commission sees improvements as compared to elder EDFs, but identifies a weakness related to the position of the NAOs as well as a potential problem related to what is labelled as a "one-size-fits-all"-approach of the EDFs.⁷⁵ It cannot be said clearly whether this problem is relevant for the EU-ESA5 partnership.⁷⁶

8.3.2 Impact assessment for the direct support of the EU for ESA5 countries

The European Commission (through DG DEVCO) selectively and regularly conducts so-called Result Oriented Monitoring (ROM) for individual projects with the EDFs for individual countries and additionally commissioned evaluation tasks for the programmes such as Smartfish; IOC (2016) assesses this programme in general as relevant and effective. The ROM are not systematically assessing the development efforts, in addition, they do not concentrate on trade-related issues. In Annexes XI and XII respectively, the available results of more concrete studies are presented in some detail.

In general, the fact that ESA5 countries requested to negotiate a deepened EPA is suggesting a positive impact of the EU efforts. As for **Comoros**, DG DEVCO concludes that the support is relevant and effective. There are, however, positive effects generated through Smartfish, namely the construction of two fish landing stations (IOC 2018, p.23). For **Madagascar**, two ROMs show a similar institutional shortcoming as well as reluctance to reform its trade regime. Smartfish was effective also in Madagascar, raising awareness for technical issues (IOC 2018, p.23). The European support for **Mauritius** was successful in that the country was able to reform its business licensing regulation including an e-licensing platform, which improved Mauritius' rank to 13th in the World Bank Doing Business Report. It benefitted from Smartfish. In addition, the Intellectual Property Law was modernised with EU help. **Seychelles** benefitted from infrastructure support under the bilateral Sustainable Fisheries Partnership Agreement (SFPA) as well as further support under Smartfish (IOC, 2018, p.23). However, efforts are hampered by governance shortcomings in Seychelles. For **Zimbabwe**, no results have been reported.

⁷⁴ Moreover, added value, complementarity and leverage are assessed. In addition, private sector development (e.g. fisheries and agriculture), infrastructure and investment are considered. In 2015, the European Center for Development Policy management carried out an independent analysis of the programming within the 11th EDF (Herrero et al. 2015). This evaluation concentrates on the process and less on outcomes; it would probably have been too early in 2015 for the latter. Two years later, the European Commission, represented by the Evaluation Unit of the Directorate-General for International Cooperation and Development, commissioned an external interim evaluation of the 11th EDF (European Commission 2017). Together with the ODI Background Note of November 2012 (Gavas 2012) and the Ex-post evaluation of the EPA between the EU and its Member States and the CARIFORUM Member States (European Commission 2021), these studies provide a reliable overview and a helpful framework for the task at hand. We will follow the criteria used by the European Commission (2017) for our assessment of the individual programmes' impact on ESA5 countries.

⁷⁵ This critique resonates also with the general discussion about aid effectiveness; see e.g. Easterly (2007).

⁷⁶ The European Parliament has long argued for an inclusion of the EDF's budget into the general EU-budget. Consequently, the EPFRS (2014) argues that the double structure has high efficiency costs of 800million EUR per annum. This figure is not substantiated with a model. We will not pick up this discussion in the assessment.

8.3.3 Some general concerns

Despite the generally positive assessment, it is impossible to reject the counter-hypothesis, namely that development aid is crowding out domestic activities of the recipient countries; in other words: Would the port be renovated without EU funding or not? A second concern is about ownership. The latter concern has been emphasised in the stakeholder consultations. While they did not focus on single projects, the stakeholders made some general observations, which can be utilised to assess the EU's development assistance for ESA5 and to increase its impact.⁷⁷

The main concern of CSOs is that the agenda is driven too much by the EU. Governments emphasize the beneficial effects of EU assistance; e.g. Mauritius praised the e-licensing platform. However, they also argue that the technical and physical capacities of the ESA5 countries still are major obstacles to implement all elements of the agreement and that project-based assistance may be rather complex to implement. The three groups presenting the private sectors had three concerns: their limited readiness for the interim and comprehensive EPA, the problem that EU assistance is not well-targeted to increase the export potential of the enterprises and **their own governments' ability to implement the EPA.**

The latter concern leads to the governance structure (or institutional setting) as one fundamental problem of developing countries and consequently a major objective of development cooperation, namely the support of developing countries to strengthen governance. Governance includes among others the fight against corruption, the abidance to the rule of law, the definition and enforcement of private property rights and administrative capacity. The vast literature on aid effectiveness has shown that institutional capacity building (including trade policy, investment protection, regulation as well as human rights, social-environmental aspects) is relatively effective. That said, it has also become evident that development cooperation is only successful if the developing country in question takes the lead in tackling its governance problem. To keep in mind this caveat can help to both manage expectations and to frame development cooperation policies as well as the deepened EU-ESA5 EPA in the way that they are most effective.

8.4 Key findings

Although it is not trivial to exactly judge the overall impact of the EU's development assistance to ESA5 countries in the process of implementation of the EU-ESA5 interim EPA, it can generally be assessed as positive. The different projects and programmes have increased the ability of ESA5 countries to make sense of the interim EPA; at least they contribute to the two main objectives, namely enhanced competitiveness of ESA economies as well their structural adjustment. Problems are the lack of ownership in the ESA5 countries and deficits in the targeting of the measures on the EU's side and governance weaknesses on the side of the ESA5 governments, albeit to a different extent. Mauritius seems to be an exception that made very good use of the support. In sum, the EU assistance to ESA5 countries is coherent with the general objectives of the interim EPA between the EU and the ESA5 partners.

⁷⁷ The detailed results of the stakeholder consultations can be found in Annex V. The Team has interviewed 60 stakeholders in the ESA5-countries from five groups: CSOs, governments, business associations or national chambers of commerce, private sector economic operators and SMEs. These interviews did not directly cover single projects of development cooperation such as introduced in this Chapter and its Annexes, but rather sought to find out the general perception of the interim EPA and the negotiations of the comprehensive EPA.

9. Conclusions

The objective of the conclusions is to synthesise the information collected in Phase I (Inception Phase) and Phase II (Ex-post Evaluation) of the project to form the ex-post in order to draw interim conclusions on a set of questions.

9.1 To what extent have the objectives of the existing interim EPA been achieved?

According to the Official Journal of the EU,⁷⁸ the interim EPA aims at general objectives (Chapter I, Article 2), more specific formal objectives (Chapter I, Article 3) and a number of specific trade related (Chapter II, Article 5), developmental (Chapter IV) as well as fishery related (Chapter III) objectives. These objectives overlap. The general objectives or the interim EPAs are the following, and we will answer the evaluation question set out above for each of them in turn:

Objective a: contributing to the reduction and eventual eradication of poverty through the establishment of a strengthened and strategic trade and development partnership consistent with the objective of sustainable development, the Millennium Development Goals and the Cotonou Agreement;

- 1) In principle according to the economic modelling performed by DG Trade, ESA4 countries benefit from the EPA with the EU in terms higher trade volumes. Beside the static effects, increased specialisation and improvements in the international division of labour cause a reallocation of domestic productive resources (labour and capital) to more productive uses. Domestic production in ESA4 countries rises, reflected by increases in these countries' real GDP (with EU GDP remaining largely unchanged).
- 2) Although poverty appears to have fallen slightly in the ESA 5 countries, particularly in Madagascar and Zimbabwe between 2012 and 2019, a direct link to the interim EPA cannot be established.
- 3) Nevertheless, strong links between national reforms, EU development cooperation, the Agreement itself and environmental, social and human rights conditions were not found. Modelling results suggest that the interim EPA brought positive results, such a decrease in CO₂ emissions and small improvements in wages, compared to a scenario without the Agreement. This suggests a high positive impact of a TSD Chapter in the deepened EPA.
- 4) The review of major exporting sectors has identified important ongoing environmental, social, gender and human rights concerns. These include concerns over social conditions in agricultural sectors with major exports to the EU. While low salaries and instances of child labour are not specifically a direct result of trade with the EU, these issues are a concern for sectors exporting to the EU.
- 5) Concerns over labour conditions have been raised in manufacturing sectors (e.g. textiles and agriculture), in which women appear to be more adversely affected. Increased production in agriculture also may have the potential to increase water consumption and water pollution. There are social, human rights and environmental concerns linked to mining in Madagascar and Zimbabwe.

Objective b: promoting regional integration, economic cooperation and good governance in the ESA region;

- 1) The EU-ESA4 EPA has not prevented to a development of export concentration ratios and increased specialisation in commodities in which ESA4 countries have international competitive advantage and which can also be observed for goods exports to regional trade blocs such as notably SADC and COMESA. As such the interim EPA contributes to deepening regional and intra-African trade integration. Furthermore,

⁷⁸ COUNCIL DECISION of 13 July 2009 on the signing and provisional application of the Interim Agreement establishing a framework for an Economic Partnership Agreement between the Eastern and Southern Africa States, on the one part, and the European Community and its Member States, on the other part (2012/196/EC)

the agreement also contributes to overall continental integration in Africa as it increased the preparedness of ESA4 countries for implementing the AfCFTA.

- 2) In addition, the interim EPA has led to new trade opportunities for outermost regions and overseas countries and territories, especially those in proximity to ESA4 countries, in different ways. As concerns trade diversion at the expense of LDCs, those countries' goods and services exports to the EU are hardly affected by the EPA.
- 3) The ESA4 countries have also made a range of policy and institutional reforms: while progress and actions have varied, there thus have been improvements in governance. The EU has provided support in a number of areas through its development cooperation.
- 4) Moreover, there is no strong link between the introduction of the interim EPA and changes in the organisation of business in the ESA countries, although EU development cooperation has sought to strengthen the ESA countries' governance structures. This indicates key areas where further policy action is needed.

Objective c: promoting the gradual integration of the ESA region into the world economy, in conformity with its political choices and development priorities;

As all ESA5 EPA countries are expected to finalise their tariff reduction schedules in 2022, one can expect that the degree of competition will increase in ESA5 countries by then. This would – everything else equal – encourage direct investment and increase the integration of the ESA5 economies into the world economy. Since this process takes time, we have not witnessed deepened integration as of December 2020.

Objective d: fostering the structural adjustment of the ESA economies and diversification including value addition;

The interim EPA has mildly contributed to these objectives. However, the concentration ratio of ESA4 exports has rather increased due to specialisation of African businesses, which is theoretically one of the effects of the liberalisation process.

Objective e: improving the ESA region's capacity in trade policy and trade-related issues;

The EPA and the accompanying development assistance helped the ESA5 countries to build trade facilities; here it is exemplified using the example of Smartfish.⁷⁹

- 1) As for **Comoros**, DG DEVCO sees governance problems as well as positive effects generated through programmes such as Smartfish.
- 2) For **Madagascar**, two result-oriented monitorings (ROMs) show a similar institutional shortcoming as well as reluctance to reform its trade regime. Smartfish was effective also in Madagascar, raising awareness for technical issues.
- 3) The European support for **Mauritius'** e-licensing platform increased trade policy capacity. In addition, the Intellectual Property Law was modernised with EU help. Mauritius also benefitted from Smartfish.
- 4) **Seychelles** benefitted from infrastructure support under the bilateral Sustainable Fisheries Partnership Agreement as well as further support under Smartfish. However, efforts are hampered by governance shortcomings in Seychelles.
- 5) For **Zimbabwe**, no positive results have been officially reported for trade-related measures.

Objective f: establishing and implementing an effective, predictable and transparent regional regulatory framework for trade and investment in the ESA region, thus supporting the conditions for

⁷⁹ Smartish supported fishers directly with teaching to reduce losses in the fishing process, to consider ecological aspects stronger and to improve management practices. See Annex XII.

increasing investment and private sector initiative and enhancing supply capacity, competitiveness and economic growth; and

It is too early to judge to which extent an effective, predictable and transparent regional regulatory framework has been established; there have been a number of projects, of which the successful efforts to increase the institutional setting (e-licensing platform) in Mauritius stands out.

The interim EPA created an overall framework governing RoO. Despite concerns about the complexity, the ESA4 countries made significant use of the EPA preferences made available to them by the EU.

Objective g: strengthening the existing relations between the Parties based on solidarity and mutual interest. To this end, consistent with WTO obligations, the Agreement shall enhance commercial and economic relations, support a new trading dynamic between the Parties by means of the progressive, asymmetrical liberalisation of trade between them and reinforce, broaden and deepen cooperation in all areas relevant to trade and investment.

In sum, the relations between the EU and ESA5 countries have improved and shown some dynamism through the interim EPA. First, both trade and FDI flows have increased. Both the CGE modelling conducted for Madagascar, Mauritius and Zimbabwe and the PE model applied for Seychelles indicate that ESA4 countries benefit from the EPA through higher exports to the EU in commodities in which they tend to have international comparative advantages. Increased specialisation and improvements in the international division of labour cause a reallocation of domestic productive resources (labour and capital) to more productive uses, which causes domestic production to rise in ESA countries, reflected by increases in these countries' real GDP (with EU GDP remaining largely unchanged). This positive trend is further enhanced by reciprocal treatment, meaning that not only ESA countries, but also the EU gets duty-free, quota-free market access into the EPA signatory countries on substantially all trade and in line with Article XXIV of GATT. The fact that service trade between the ESA4 countries and the EU (not covered in the interim EPA) also increased since the signing of the interim EPA, can also be cautiously interpreted as a sign of increasing trade dynamics between the EU and ESA5 countries.

Second, the good relations also can be seen in the Minutes of the annual EPA Committee Meetings, which document a trustful and result oriented collaboration, in which both partners try to react to each other's requests and concerns. It can be expected that this good atmosphere will be (and obviously has already been) transferred to the negotiations of the deepened EPA.

9.2 Which sectors, activities, groups or countries in ESA4 have benefited most as a result of the EPA and which ones have incurred losses due to the EPA?

The review of the evidence gathered so far indicates that the interim EPA overall has not had major impacts on environmental, social conditions, gender and human rights conditions in ESA countries. **Concerning environmental impacts related to the interim EPA, these mainly appear linked to the scale of EU exports.**

As concerns domestic sector output (overall production by domestic industries) in the EU and ESA countries, the impacts of the EPA are estimated to be relatively low, often negligible for most sectors of the economy. Nevertheless, the CGE and PE model employed by DG Trade respectively show some significant effects.

- 1) Compared with a scenario without the interim EPA, Mauritius' sugar products production is estimated to increase by 52.1% , Mauritius' fishery and seafood sector is estimated to gain 10.2%, and Mauritius' textiles sector is estimated to expand by 6.3% ("Textiles") and 5.7% ("Wearing apparel") due to the EPA.
- 2) Madagascar's "Non-ferrous metals" sector is estimated to rise by 5.2% due to the EPA. Major structural effects linked to a diversification of exports have not been identified.

- 3) Despite not being covered in the interim EPA, ESA4 countries' total services exports to the EU generally increased from 2012 to 2018, amounting to 322 million EUR for Madagascar in 2018, 2 billion EUR for Mauritius, 567 million EUR for Seychelles, and 207 million EUR for Zimbabwe.
- 4) For Mauritius and Seychelles, services exports to the EU are significantly higher than goods exports, driven by these countries' strong tourism services exports.

In absence of the EPA, EU total exports to Madagascar are estimated to be 30% lower, the EU's manufacturing sectors are estimated to benefit most from tariff reductions on the side of ESA countries, with "Manufactures n.e.c." (which includes a wide array of high and less knowledge-intensive products), "Machinery and equipment" and "Other metal products" taking the lead. It should be noted that EU exports of "Wearing apparel" to Madagascar and Mauritius show high percentage increases.

9.3 Has the EPA with ESA4 given rise to unintended consequences?⁸⁰

The Team has interviewed 60 stakeholders in the ESA5-countries from five groups: CSOs, governments, business associations or national chambers of commerce, private sector economic operators and SMEs. These interviews generated some general observations, which can be utilised to improve the EU's development assistance for ESA5 and to increase its impact.

- 1) The main concern of CSOs is that the agenda is driven too much by the EU. This is a general problem of development cooperation and not easy to be solved.
- 2) Governments argue that the technical and physical capacities of the ESA5 countries still are major obstacles to implement all elements of the agreement and that project-based assistance may be rather complex to implement. While this observation may be in principle correct, a remedy would be to optimise domestic governance structures so that the country can make the best use of the available funds.
- 3) The three groups presenting the private sectors had three concerns: their limited readiness for the interim and comprehensive EPA, their own governments' ability to implement the EPA and the problem that EU assistance is not well targeted to increase the export potential of the enterprises. Indirectly, the interim EPA did not consider these bottlenecks.

9.4 What are the shortcomings of the existing EPA that need to be addressed in the deepening negotiations?

- 1) The first shortcoming is that the interim EPA lacks specific provisions to help achieve objective a (see above). Negotiation of a TSD chapter thus seems a necessity for an improvement of labour and environmental conditions and the achievement of this objective.
- 2) The focus of the interim EPA has been on the trade dimension and less emphasis has been placed on the development dimension of the EPAs. The EPA development agenda would better be more balanced. It could be based on a self-assessment of needs by the ESA5 countries themselves and take a demand-side approach (meaning that the ESA5 countries outline their needs) in addition to a supply-side approach (meaning that the EU specifies the funding available and how that funding can be utilised).
- 3) Concerns are raised about the complex nature of the interim EPA; it is argued to form a challenge for the ESA5 countries. In addition, some of the ESA5 private sector companies, including SMEs, find it difficult to take advantage of the EPA. This is an important lesson for the potentially even more complex negotiations about issues such as government procurement, competition or trade in services to come.

⁸⁰ We follow the order suggested in the ToR but would like to make the point that the unintended consequences and shortcomings are very closely related. In fact, all problems mentioned in 9.3 and 9.4 appear relevant for both.

- 4) A number of challenges remain to be addressed for RoO to benefit stakeholders: a further simplification of RoOs closer alignment of the development and trade components of the EPA; involve the private sector and potential new investors in trade negotiations, to the extent possible.

9.5 What are good practices and lessons learned on EPA implementation on both the ESA4 and the EU side?

- 1) The ex-post evaluation has shown that relevant development projects and programmes implemented since 2012, both at a regional scale and for individual countries, have sought to strengthen aspects of governance and improve key areas of the business environment in the five ESA countries, despite the small progress. Thus, EU action is linked to outputs in the areas of governance and the business environment, and it is likely that it also has had an influence in terms of outcomes within the countries.
- 2) That said, governance is important as the positive example of Mauritius teaches; think of the e-licensing system. This suggests that further development cooperation on governance is valuable.
- 3) Governments emphasize the beneficial effects of EU assistance; e.g. Mauritius praised the e-licensing platform.
- 4) For most stakeholder we interviewed, information from the print and digital media, academic writing, capacity building programmes, including meetings, have helped them learn more about EPAs and the processes involved. This implies that the ESA5 countries should raise efforts to rise the awareness of the deepened EPA in civil society.
- 5) Trade facilitation support, such as infrastructure projects, has had a positive impact. Although it cannot be quantified, this avenue promises further success.

Bibliography

- Abrego, L., M.A. Amado, T. Gursoy, G.P. Nicholls and H. Perez-Saiz (2019), The African Continental Free Trade Agreement: Welfare Gain Estimates from a General Equilibrium Model, Washington: IMF Working Paper 19/124.
- African Development Bank Group, African Union Commission and the United Nations Economic Commission for Africa (2019), African Statistical Yearbook 2019, Addis Ababa.
- African Union, African Development Bank Group and UNECA (2020), Africa Regional Integration Index, Report 2019, Addis Adaba.
- Akman, S., Brandi, C., Dadush, U., Draper, P., Freytag, A., Kautz, M., ... & Vos, R. (2018), Mitigating the Adjustment Costs of International Trade, Economics Discussion Papers No. 2018-49.
- Albagoury, Samar H. and Mahmoud Anber (2018), COMESA-SADC-EAC Tripartite Free Trade Area: Challenges and Prospects, Cairo.
- Arndt, Channing and Simon J. Roberts (2018), Key issues in regional growth and integration in Southern Africa, Development Southern Africa, Vol. 35, no. 3, pp. 297-314.
- Asche, Helmut (2019), Regional Integration, Trade and Industrialization in Africa, mimeo, Mainz.
- Balistreri, E. and Rutherford, T. (2013): "Computing general equilibrium theories of monopolistic competition and heterogeneous firms." In Dixon, P.B. and Jorgenson, D.W. (ed.): Handbook of Computable General Equilibrium Modeling. Chapter 23, pp. 1513–1570. Oxford (UK), Elsevier.
- Bauer, Matthias and Andreas Freytag (2015), The Tripartite. What to Expect from Africa's Grand Free Trade Area, World Commerce Review, June, pp. 86-89.
- Baunsgaard, Thomas and Michael Keen (2020), Tax Revenue and (or?) Trade Liberalisation, Journal of Public Economics, Volume 94.
- Bchir, M.-H., Y. Decreux, J.-L. Guérin and S. Jean (2002) "MIRAGE, A CGE Model for Trade Policy Analysis", CEPII Working Paper 2002-17.
- Borg, M. (2006), Taxation Structures in Small States with Special Reference to Revenue Implications Following Trade Liberalisation. Bank of Valletta Review, No. 34.
- Bronauer, Jan and Ji Yoon (2018), Regional Economic Development in SADC: Taking Stock and Looking Ahead, SAIIA Report 25, Johannesburg.
- CIA (2020), The World Fact Book, <https://www.cia.gov/library/publications/resources/the-world-factbook/>, quoted as CIA.
- COMESA Secretariat (2017, RISP 3 End of Project Report.
- Decreux, Y. and Valin, H. (2007) "MIRAGE, Updated Version of the Model for Trade Policy Analysis with a Focus on Agriculture and Dynamics", CEPII Working Paper 2007-15.
- Depretis Chauvin, N., M.P. Ramos and G. Porto. (2016), Trade, Growth, and Welfare Impacts of the CFTA in Africa, mimeo, Geneva and Buenos Aires.

- Draper, P (2007) EU-Africa Trade Relations: The Political Economy of Economic Partnership Agreements, ECIPE Jan Tumlrir Policy Essay 2/2007, Brussels.
- Draper, Peter (2007), EU-Africa Trade Relations: The Political Economy of Economic Partnership Agreements, ECIPE Jan Tumlrir Policy Essay 2/2007, Brussels.
- Draper, Peter, Habtamu Edjigu and Andreas Freytag (2018), The African Continental Free Trade Agreement: Much Ado About Nothing, or an Important Integration Foundation? World Economics.
- Draper, Peter, Habtamu Edjigu and Andreas Freytag (2020), A Political Economy Assessment of the AfCFTA, forthcoming as Contribution to Palgrave Handbook of Africa's Economic Sectors, Contemporary Opportunities, and Sustainable Development.
- Easterly, William (2007), the White Man's Burden, London: Penguin Books.
- ECDPM (2006) Overview of the regional EPA negotiations: <https://ecdpm.org/wp-content/uploads/2013/11/IB-14E-Overview-Regional-EPA-Negotiations-ESA-EU-EPA-2006.pdf>
- Economic Commission for Africa, African Development Bank Group and African Union Commission (2019), African Statistical Yearbook 2019, quoted as AU (2019).
- Erasmus, Gerhard (2018), The AfCFTA: Overview and Implications, tralac Trade Brief No. S18TB06/2018. tralac. Stellenbosch.
- EU Action Plan (2016) Gender Equality and Women's Empowerment: Transforming the Lives of Girls and Women through EU External Relations 2016-2020.
- European Commission (2008) Update: Economic Partnership Agreements. Found at https://ec.europa.eu/commission/presscorner/detail/en/MEMO_08_15.
- European Commission (2014), Ex-post evaluation of the EPA between the EU and its Member States and the CARIFORUM Member States, Inception report.
- European Commission (2015a) Assessment of economic benefits generated by the EU Trade Regimes towards developing countries, Volume I, Brussels.
- European Commission (2015b) Assessment of economic benefits generated by the EU Trade Regimes towards developing countries: Export Performance and Poverty Reduction Volume II, Brussels.
- European Commission (2015c) Guidelines on the analysis of human rights impacts in impact assessments for trade-related policy initiatives.
- European Commission (2017), External Evaluation of the 11th European Development Fund (EDF) (2014 – mid 2017), Final Report, Brussels.
- European Commission (2017a), Study on the Impact of the Interim Economic Partnership Agreement on the ESA signatory countries and the setting up of an EPA Fund.
- European Commission (2017b), Ex-post evaluation of the implementation of the EU-Mexico Free Trade Agreement, Final Report.
- European Commission (2018), Evaluation of the Implementation of the Free Trade Agreement between the EU and its Member States and the Republic of Korea Final Report: Main Report.

- European Commission (2019a) Economic Partnership Agreement between the EU and the ESA EPA Group.
- European Commission (2019b) European Union, Trade in goods with ACP -- Eastern and Southern Africa (ESA)
- European Commission (2019c), Sustainability Impact Assessment in Support of the Negotiations for the Modernisation of the Trade Part of the Association Agreement with Chile, Final Report.
- European Commission (2019d), Trade Sustainability Impact Assessment in support of FTA negotiations between the European Union and New Zealand, Draft Final Report.
- European Commission (2019e), Trade Sustainability Impact Assessment in support of FTA negotiations between the European Union and Australia, Draft Final Report.
- European Commission (2019f), Sustainability Impact Assessment in Support of the Negotiations for the Modernisation of the Trade Part of the Association Agreement with Mexico, Final Report.
- European Commission (2020), COMMISSION STAFF WORKING DOCUMENT Individual reports and info sheets on implementation of EU Free Trade Agreements Accompanying the document REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS on Implementation of EU Trade Agreements 1 January 2019 - 31 December 2019, Brussels.
- European Commission (2020a), Report on the 1st Round of Negotiations between the EU and Five Eastern Southern African Countries for the Deepening of the Currently Implemented Economic Partnership Agreement, 5 February 2020, Brussels
- European Commission (2020b), The Impact of the COVID-19 Pandemic on Global and EU Trade, Chief Economist Team, DG Trade, 17 April 2020, Brussels
- European Commission Tool #28. Fundamental rights & human rights
- European Council (2012), Council Decision of 13 July 2009 on the signing and provisional application of the Interim Agreement establishing a framework for an Economic Partnership Agreement between the Eastern and Southern Africa States, on the one part, and the European Community and its Member States, on the other part (2012/196/EC).
- European Parliamentary Research Service (2014), European Development Fund. Joint Development Cooperation and the EU-Budget: In or Out. In-depth Analysis, Brussels, cited as EPRS 2014.
- Fearon, James D. (2003) Ethnic and Cultural Diversity by Country, Journal of Economic Growth, Vol. 8, No. 2, pp. 195-222.
- Fraser Institute (2020), Economic Freedom, <https://www.fraserinstitute.org/studies/economic-freedom>.
- Freedom House (2019), Democracy in Retreat – FREEDOM IN THE WORLD 2019, Washington D.C., quoted as FH.
- Gavas, Mikaela (2012), Replenishing the 11th European Development Fund, London: Overseas Development Institute, ODI Background Note November 2012.
- Geda, A., and A. Yimer (2019), The Trade Effects of the African Continental Free Trade Area (AfCFTA): An Empirical Analysis, mimeo: Addis Ababa University.

Government of Mauritius (2015) Green Economy Assessment Mauritius.

Herrero, Alisa, Anna Knoll, Cecilia Gregersen and Willy Kokolo (2015), Implementing the Agenda for Change. An Independent Analysis of the 11th EDF Programming, PCDPM Discussion Paper No. 180, www.ecdpm.org/dp180.

Imani Development (2016), The Evaluation of the Regional Integration Support Programme, Mid-Term Review, Port Louis.

Indian Ocean Commission (2016), Mid-Term Evaluation of IOC-SmartFish Programme – Phase II. Final Report cited as IOC 2016.

Indian Ocean Commission (2018), Smartfish Final Report, PE 3, Ebene, cited as IOC 2018.

International Monetary Fund (2019a), Regional Economic Outlook Sub-Saharan Africa - Recovery Amid Elevated Uncertainty, Washington D.C., International Monetary Fund.

International Monetary Fund (2019b), World Economic Outlook October 2019, Washington D.C., International Monetary Fund, quoted as WEO.

International Monetary Fund (2020), Regional Economic Outlook Sub-Saharan Africa - COVID-19: An Unprecedented Threat to Development, Washington D.C., International Monetary Fund.

Jensen, H. G. (2015) The Continental Free Trade Area - A GTAP assessment.

Kassim, L. (2016), The Revenue Implication of Trade Liberalization in Sub-Sharan Africa: Some New Evidence, University of Kent, School of Economics Discussion Papers.

Keen, Michael, and Mario Mansour, (2010), Revenue Mobilisation in Sub-Sahara Africa: Challenges form Globalisation I – Trade Reform, Development Policy Review Vol. 28. No. 5, pp. 553-571.

Krapohl, Sebastian & Sophie Van Huut (2020) A missed opportunity for regionalism: the disparate behaviour of African countries in the EPA-negotiations with the EU, Journal of European Integration, 42:4, 565-582, DOI: [10.1080/07036337.2019.1666117](https://doi.org/10.1080/07036337.2019.1666117)

Leandro Medina, Andrew Jonelis, and Mehmet Cangul (2017), The Informal Economy in Sub-Saharan Africa: Size and Determinants, Washington: IMF Working Paper 17/156.

Makochekanwa, Albert (2014), Welfare Implications of COMESA-EAC-SADC Tripartite Free Trade Area, African Development Review, Vol. 26, Issue 1, pp. 186-202.

Mevel, S., and M. Mathieu (2016), Emergence of Mega-Regional Trade Agreements and the Imperative for African Economies to Strategically Enhance Trade-Related South-South Cooperation, 19th Conference on Global Economic Analysis, Washington DC. (2016).

Mevel, S., and S. Karingi (2012), Deepening Regional Integration in Africa: Computable General Equilibrium Assessment of the Establishment of a Continental Free Trade Area followed by a Continental Customs Union. 7th African Economic Conference Kigali, Rwanda.

Meyn, Mareike (2005), *The Challenges of Economic Partnership Agreements (EPAs) for Regional Integration and Trade Capacity Building in Southern Africa* <https://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.501.1270&rep=rep1&type=pdf>

Reporters without Borders (2020), Website, <https://rsf.org/en>, quoted as RSF.

Riedel, Jana and Anja Slany (2018), New Panel Data Evidence on Sub-Saharan Trade integration - Prospects for the COMESA-EAC-SADC Tripartite, mimeo, Münster and Bochum.

Trading Economics (2020), Economic Indicators, <https://tradingeconomics.com>.

tralac (2020), Website: www.tralac.org.

Transparency International (2019), Corruption in the World 2019, <https://www.transparency.org/en/cpi>, quoted as TI.

UN (2020), Human Development Reports, <http://hdr.undp.org/en/content/human-development-index-hdi>.

UNCTAD (2015), GSP Handbook of the Scheme of the European Union, Geneva: UNCTAD.

UNCTAD (2016), Implementing gender-aware ex-ante evaluations to maximize the benefits of trade reforms for women.

UNCTAD (2020), International Trade Statistics,
<http://unctadstat.unctad.org/wds/TableView/tableView.aspx?ReportId=120>.

UNCTAD/WTO (2016) A Practical Guide to Trade Policy Analysis. Geneva: UNCTAD/WTO.

UNECA (2003), Government Revenue Implications of Trade Liberalization in Africa (2003), Paper presented at Addis Ababa. UNECA. (October 1-2, 2003).

UNECA (2016), Investment Policies and Bilateral Investment Treaties in Africa Implications for Regional Integration, Addis Adaba.

UNECA and FES (2017), The Continental Free Trade Area (CFTA) in Africa – A Human Rights Perspective, Geneva: UNECA and Friedrich Ebert Stiftung. (2017).

Woolcock, Stephen (2007), European Union Policy towards Free Trade Agreements, ECIPE Working Paper 3/2007, Brussels.

World Bank (2013), Women and Trade in Africa: Realizing the Potential, Washington D.C.

World Bank (2020), Doing Business 2020. <https://www.doingbusiness.org>, quoted as World Bank.

World Economic Forum (2020), Global Enabling Trade Report, <http://reports.weforum.org/global-enabling-trade-report-2016/>.

World Trade Organization (2017), Factual Presentation: EPA between the ESA States and the EU (Goods and Services), Report by the Secretariat.

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Annex II. Overview of ESA5 and Liberalisation Schedules

Table 13: Overview of EU-ESA trade liberalisation schedule and exclusions

Country	Liberalisation of EU imports	Timeframe	Main exclusions from liberalisation
Madagascar	89% of liberalisation in terms of tariff lines, 81% of liberalisation in terms of volume of trade	Start of effective liberalisation: 2015 End: 2022	Meat, milk and cheese, fisheries, vegetables, cereals, oils and fats, edible preparations, sugar, cocoa, beverages, tobacco, chemicals, plastic and paper articles, textiles, metal articles, furniture
Mauritius	96% of liberalisation in terms of tariff lines, 96% of liberalisation in terms of volume of trade	Start of effective liberalisation: 2013 End: 2022	Live animals and meat, edible products of animal origin, fats, edible preparations and beverages, chemicals, plastics and rubber articles of leather and fur skins, iron & steel and consumer electronic goods
Seychelles	98% of liberalisation in terms of tariff lines, 97% of liberalisation in terms of volume of trade	Start of effective liberalisation: 2013 End: 2022	Meat, fisheries, beverages, tobacco, leather articles, glass and ceramic products and vehicles
Zimbabwe	86% of liberalisation in terms of tariff lines, 80% of liberalisation in terms of volume of trade	Start of effective liberalisation: 2017 End: 2022	Products of animal origin, cereals, beverages paper, plastics and rubber, textiles and clothing, footwear, glass and ceramics, consumer electronic and vehicles
Comoros	95.7% of liberalisation in terms of tariff lines, 81% of liberalisation in terms of volume of trade	Start of effective liberalisation: 2022 ⁸¹ End: n/a	Products of animal origin, fish, beverages, chemicals and vehicles.

Source: Elaboration from DG TRADE publications⁸²

Table 14: ESA5: Cultural, Political, Economic, and Regulatory Indicators and Infrastructure

Country	Comoros	Madagascar	Mauritius	Seychelles	Zimbabwe	Source
Population, Culture, Social Aspects						
Population	846,000	26,955,000	1,379,000	96,000	14,546,000	CIA
Urbanisation (%)	29.4	38.5	40.8	57.5	32.2	CIA
Ethnic diversity	n/a	0.861	0.632	n/a	0.366	Fearon (2003)
Median age (years)	20.9	20.3	36.3	36.8	20.5	CIA
Literacy in % of population	58.8	74.8	91.3	95.9	86.5	CIA

⁸¹ Based on a personal conversation with DG Trade; official dates could not be found.

⁸² Terms of References, DG Trade publications, see https://trade.ec.europa.eu/doclib/docs/2012/march/tradoc_149213.pdf and https://ec.europa.eu/commission/presscorner/detail/en/MEMO_08_15

Population below poverty line (latest) %	13.5 (2004)	81.8 (2010)	0.5 (2012)	0.4 (2006)	n/a	AU 2019
Life expectancy at birth (years)	65.7	67.3	76.5	75.6	62.3	CIA
Gini (latest)	55.9 (2004)	40.6 (2010)	35.8 (2012)	46.8 (2013)	n/a	AU 2019
HDI (2018)	0.538	0.521	0.796	0.8	0.553	UN
Political Liberties, Institutions						
Civil liberties (2018)	4	3	2	3	5	FH
Political rights (2018)	4	3	1	3	5	FH
Press Freedom, score and rank (of 180 countries, 2018)	29.77 (75)	27.68 (54)	28 (56)	28.66 (63)	40.95 (126)	RSF
CPI score and rank (of 180 countries, 2018)	25 (153)	24 (158)	52 (56)	n/a	24 (158)	TI
Economic Aspects						
Unemployment (2019)	3.7	1.7	6.9	3.0	4.9	Trading Economics, WEO
Inflation (2019)	3.2	6.7	0.9	2.0	160	
Diversification of exports (2018)	0.734	0.761	0.708	0.808	0.826	UNCTAD
Doing Business: score und rank (out of 190 countries, 2019)	160 (47.9)	161 (47.7)	13 (81.5)	100 (61.7)	140 (54.5)	World Bank
• Getting Credit (rank)	132	132	67	65	67	World Bank
• Trading across borders (rank)	120	140	72	98	159	World Bank
Africa regional integration index score and rank (out of 54, 2019)	0.35 (20)	0.296 (37)	0.424 (5)	0.393 (11)	0.387 (12)	AU, ADB and UNECA (2020)
IPAs signed	n/a	7	11	n/a	4	UNECA
Economic freedom score	n/a.	6.14 (126)	8.07 (9)	7.16 (63)	5.69 (145)	Fraser Institute

and rank (of 161 countries), 2019						
Landmass (sq. km)	2,235	581,540	2,030	455	386,847	CIA
Territorial sea/ exclusive economic zone (nautical miles)	12/200	12/200	12/200	12/200	n/a	CIA
Potential agricultural land (%)	84.4	71.1.	43.8	6.5	42.5	CIA
Communication, Infrastructure						
Internet access/Capita	7.9	4.7	53.2	56.5	23.1	CIA
Mobile telephony contracts/Capita	61	41	141	189	92	CIA
Liner shipping connectivity, score and rank (of 104 countries), 2016	n/a	10.7 (74)	28.6 (53)	n/a	n/a	
Paved/unpaved roads (km)	673/207	31,640 (total)	2,379/49	514/12	18,481/78,786	CIA
Railways (km)	0	836	0	0	3,247	CIA
Airports (with paved runways)	4	26	3	2	17	CIA

Explanation: We have always used the latest available dates, which means in a single case that we have rather old information. It also implies that we do not always know the exact year. Most of the institutional indices presented in the Table are based on experts' assessments. Description of indices:

- 1) The World Bank Doing Business measure consists of 12 sub-indices covering the following areas: Starting a business, dealing with construction permits, getting electricity, registering properties, getting credit, protecting minority investors, paying taxes, trading across borders, enforcing contracts, resolving insolvency, Employing workers, contracting with the government. It is a dimensionless index normed between 0 and 100 based on the simple average of the 12 sub-indices. A higher value signals easier business conditions.
- 2) The diversification of exports is calculated by UNCTAD (2020) as a concentration index, based on the Herfindahl-Hirschmann Index (here: Product HHI), with values between 0 and 1. An index value closer to 1 (to 0) is a sign that a country's exports or imports are highly (lowly) concentrated on a few products.
- 3) The Fraser Institute's index of Economic Freedom consists of 26 indicators within five groups (size of government, legal system and property rights, sound money, freedom to trade internationally, regulation) and is an unweighted average ranging from 0 to 10. A higher value signals higher economic freedom.
- 4) The Freedom House indices of civil liberties and political freedom range between 1 and 7; a higher value shows lower rights and liberties respectively.

- 5) The corruption perception index (CPI) is calculated based on between 10 and 16 questionnaires (depending on availability). If a country is included in three, it is covered. The measure is normed between 0 and 100. A lower score indicates higher corruption.
- 6) Ethnic diversity is calculated as a fractionalization index: $F = 1 - \sum_{i=1}^n p_i^2$, with n denoting the number of ethnic groups and p_i denoting the share of the i^{th} ethnic group. A lower value indicates lower fractionalization.
- 7) Press Freedom is calculated by *Reporters without Borders* based on a questionnaire with more than 80 questions. The outcome is transformed into an index between 0 and 100, with lower values indicating higher press freedom.
- 8) The Liner Shipping Connectivity Index assesses a country's connectivity to global shipping networks. The index uses an open scale, with a benchmark score of 100 corresponding to the highest value (<http://reports.weforum.org/global-enabling-trade-report-2016/>).

Annex III. Research Methods and Analytical Model

Approach to the ex-post evaluation

Scope of the evaluation

The scope of the evaluation identifies what is evaluated, over what period and for which geographical area. The thematic scope of the mini ex-post evaluation under this assignment includes all areas of the interim EPA, while the geographic scope covers both the EU and its Member States and the ESA5. The assessment begins at the start of the provisional applications with each partner country (2012 for ESA4 countries), with recognition of the limitations of Comoros having joined in 2019 only.

Baseline scenario

The evaluation questions were answered by comparing the changes observed with the situation before or without the policy intervention and by assessing whether the changes observed can be attributed to the policy intervention, at least to some extent (the causality link). The situation depicted with the ex-post evaluation will provide the baseline for the SIA.

The definition of the baseline scenario takes into account regulations and trade provisions with the EU that were implemented before the interim EPA's provisional application or that would have been applied in the absence of the EPA.

Intervention Logic (IL)

The intervention logic for the mini ex-post evaluation was presented above. It depicts the main objectives, components and expected results of the policy intervention, and the expected causality links and assumptions which will need to be verified during the evaluation.

Evaluation Matrix (EM)

The ToR for this evaluation defines the main evaluation questions to be answered (see above), which guide the evaluation component of the assignment. The evaluation questions have been grouped under four evaluation criteria (effectiveness, efficiency, coherence and relevance). In addition, the EM presents judgement criteria for each evaluation question, specific indicators and sources to support the assessment.

Approach to economic impacts

The economic analysis in the ex-post component of this SIA makes use of the CGE economic modelling (including a partial equilibrium analysis for Seychelles) undertaken by DG Trade. The analysis will also include a discussion of the robustness of the results and outline limitations of the modelling, e.g. different degrees of preference utilisation and the potential misrepresentation of dynamic impacts from innovation and FDI.

Based on this analysis, an assessment of the impact of dismantling barriers with a focus on the ESA5 countries will be conducted, for each country individually, and as a group. This economic impact assessment focuses in particular on investment flows (and also services). The analysis also takes into account possible effects on governance as well as the business and investment environment; also, effects on regional integration efforts and third parties will be analysed.

The table provides an overview of relevant data sources for evaluations that go beyond the results of the economic modelling undertaken by DG TRADE, e.g. progress in the elimination of import tariffs, the development of actual trade and investment volumes, the assessment of patterns in regional economic integration (trade and investment), the development of primary, secondary and tertiary sectors, the development of sector regulations, and progress concerning regulatory cooperation. The relevant data for the analysis will be primarily taken from international databases outlined in the table below. Our analysis has also

focused on identifying potential gaps in information availability. Gaps in international databases mentioned in Table 15 may affect the economic analysis for individual countries in particular on foreign direct investment, services trade and international public procurement. Gaps might occur when data availability differs between countries covered in international sources or when data for the latest years are not yet available for some countries. International sources often rely on information provided by individual countries and weak reporting of such information might result in data gaps. Where applicable due to limited data availability in the international sources outlined in Table 15, the team will consult and collect data from relevant national bodies and statistical agencies in these countries.

Table 15: Economic analysis– themes, methods and data sources

Theme	Methods/Indicators	Data sources
Customs and trade facilitation, technical barriers to trade	<ul style="list-style-type: none"> ▪ Literature review ▪ Analysis of relevant legal framework ▪ Data collection from industry players as well as relevant national institutions and international organisations 	<ul style="list-style-type: none"> ▪ Resources provided by the African Union, relevant national institutions and WTO (reports, statistics, treaties) ▪ WTO WITS database (non-tariff measures (NTM) data). ▪ Stakeholder consultation
Economic performance	<ul style="list-style-type: none"> ▪ GDP; exports (as a contribution to GDP) ▪ Export performance, international demand, alternative markets and competitive markets, directory of importing and exporting companies 	<ul style="list-style-type: none"> ▪ Eurostat ▪ WTO WITS database (international merchandise trade) ▪ ITC Trade Map
Trade in goods and market access	<ul style="list-style-type: none"> ▪ Export; import; turnover (imports/exports) 	<ul style="list-style-type: none"> ▪ Eurostat (trade in goods statistics; COMEXT database) WTO WITS database (international merchandise trade) ▪ ITC Trade Map
Trade in services	<ul style="list-style-type: none"> ▪ Import/export trade flows for services 	<ul style="list-style-type: none"> ▪ Eurostat (trade in services statistics) ▪ World Bank ▪ UNCTAD ▪ Central Banks?
Regional economic integration	<ul style="list-style-type: none"> ▪ Value-added content in exports, participation in global value chains, the contribution of services and digital trade, where relevant, to the value-added content of exports. ▪ Trade in intermediate goods and services) ▪ Business process analyses on the value chains of the various sub-sectors of the industry to identify where the challenges are in the value chains and devise possible solutions. 	<ul style="list-style-type: none"> ▪ OECD-WTO Trade in Value Added (TiVA) database ▪ Resources provided by the African Union, relevant national institutions and WTO ▪ Stakeholder consultation
Export diversification	<ul style="list-style-type: none"> ▪ Import/export trade flows in goods and services 	<ul style="list-style-type: none"> ▪ Eurostat (trade in goods statistics; trade in services statistics)
Trade competitiveness	<ul style="list-style-type: none"> ▪ Revealed comparative advantage (RCA, Balassa index); 	<ul style="list-style-type: none"> ▪ Eurostat (trade in goods statistics; trade in services statistics)

Consumer welfare	<ul style="list-style-type: none"> ▪ Consumer prices (rents, imports), product quality, consumer choice (import as a proxy for increased product variety) 	<ul style="list-style-type: none"> ▪ FAO ▪ Resources provided by the African Union, relevant national institutions and WTO (reports, statistics, treaties) ▪ Stakeholder consultation
Small and medium-sized businesses (SMEs)	<ul style="list-style-type: none"> ▪ Number of SMEs by sector ▪ Number of SMEs that engage in cross-border trade ▪ Regulatory burden for SMEs 	<ul style="list-style-type: none"> ▪ Trade by enterprise characteristics database (for EU) ▪ Resources provided by the national administration ▪ Stakeholder consultation
Competition policy	<ul style="list-style-type: none"> ▪ Intensive literature review ▪ Analysis of relevant legal framework ▪ Import or export-related (quasi) monopolies; ▪ Main subsidy schemes in place; existing transparency arrangements ▪ Biggest SOEs and sectors with SOE predominance ▪ Special conditions or privileges given to SOEs ▪ Other practices such as targeted subsidies 	<ul style="list-style-type: none"> ▪ Resources provided by the African Union, relevant national institutions and WTO (reports, statistics, treaties) ▪ Stakeholder consultation
Investment and private sector development, market attractiveness	<ul style="list-style-type: none"> ▪ FDI stock; FDI flow; business environment; localised production ▪ Description of the legal framework and legislative requirements governing liberalisation ▪ Opportunities and challenges for EU SMEs 	<ul style="list-style-type: none"> ▪ UNCTAD bilateral FDI data ▪ OECD bilateral FDI data ▪ Resources provided by the African Union, relevant national institutions and WTO (reports, statistics, treaties) ▪ Stakeholder consultation
Intellectual property rights	<ul style="list-style-type: none"> ▪ Border enforcement of ▪ intellectual property rights (IPR), including GIs ▪ Description of the legal framework 	<ul style="list-style-type: none"> ▪ Resources provided by the African Union, relevant national institutions and WTO (reports, statistics, treaties) ▪ Stakeholder consultation
Public procurement	<ul style="list-style-type: none"> ▪ Data on public imports ▪ Description of the legal framework and legislative requirements governing liberalisation ▪ Opportunities and challenges for EU SMEs ▪ Contract award notices published in OJ (available on TED) 	<ul style="list-style-type: none"> ▪ World Input-Output Database (WIOD) ▪ Resources provided by the African Union, relevant national institutions and WTO (reports, statistics, treaties) ▪ Stakeholder consultation
Agriculture	<ul style="list-style-type: none"> ▪ Food and agriculture statistics ▪ Global development data ▪ Trade and output data 	<ul style="list-style-type: none"> ▪ FAO ▪ World Bank ▪ Eurostat ▪ WTO WITS database

Development issues	<ul style="list-style-type: none"> ▪ Intensive literature review ▪ Internationally comparable sets of data for trade and development and interrelated issues in the areas of finance, technology, investment and sustainable development ▪ Data collection from industry players as well as relevant national institutions and international organisations 	<ul style="list-style-type: none"> ▪ UNCTAD ▪ Resources provided by the African Union, relevant national institutions and WTO (reports, statistics, treaties) ▪ Stakeholder consultation
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Source: Own compilation

In stage II (assessment of potential impacts of the deepening process), depending on data availability, the team will refer to the modelling results to identify countries and sectors which gain from imports and exports. We will also refer to changes in domestic output (production) on a country and sector basis.⁸³ The team will also discuss the robustness of the results and explain the time horizon for the effects to materialise. CGE models are suitable to estimate medium- to long-term effects, i.e. changes in the economy after a period of several years that allow economic agents to adjust to new regulatory frameworks e.g. reduced tariffs or less discriminatory rules for trade. While economies generally benefit from trade liberalisation in the medium- to long-term (more output, more trade, higher standards of living), in the short term, increased competition causes some groups to lose from trade liberalisation. Our team will discuss the “vulnerable” groups, the implications for structural economic change, and point to measures that help to mitigate/ compensate for the negative effects on these groups' incomes.

CGE analysis with MIRAGE (for Madagascar, Mauritius and Zimbabwe)

The CGE analysis is based on the MIRAGE model, which was developed and is maintained at the Centre d'Études Prospectives et d'Informations Internationales (CEPII) in France. A detailed description is given in Decreux and Valin (2007)⁸⁴ and Bhir et al. (2002).⁸⁵ The analysis is based on the GTAP database version 9.2 with the base year 2011. To account for recent changes in economic developments, key variables, specifically GDP, population, labour force, the current account balance, the savings rate (for all regions) and sectoral bilateral trade flows (for the partners) were updated to reflect 2019 data.⁸⁶ Furthermore, the tariff preferences from the EPA, reflecting the state of implementation in 2019 have been incorporated as the database pre-dates the implementation of the EPA.⁸⁷

The counterfactual scenario is implemented by re-introducing tariffs and comparing the current situation to one where the EPA would not be in place, i.e. a situation in which tariffs would have been left unchanged. Implementation happens by removing applicable preferential margins. For the partner countries, the source of these is the tariff schedules for 2019. For the EU, the sources are TRAINS⁸⁸ data via the World Bank's WITS⁸⁹ facility complemented by the CDC⁹⁰ database managed by DG TAXUD.

⁸³ Relevant examples are given, for instance, in the impact assessment of the EU-Japan FTA. For an overview of outputs see, e.g., tables 4.5 and 4.6. Available at https://trade.ec.europa.eu/doclib/docs/2018/july/tradoc_157115.pdf.

⁸⁴ Decreux, Y. and Valin, H. (2007) "MIRAGE, Updated Version of the Model for Trade Policy Analysis with a Focus on Agriculture and Dynamics", CEPII Working Paper 2007-15.

⁸⁵ Bhir, M.-H., Y. Decreux, J.-L. Guérin and S. Jean (2002) "MIRAGE, A CGE Model for Trade Policy Analysis", CEPII Working Paper 2002-17.

⁸⁶ IMF World Economic Outlook (WEO) 10/2019 data for GDP and UN COMTRADE data for bilateral trade. The remainder from CEPII projections.

⁸⁷ This has happened only where preferences actually changed to those applied unilaterally before, i.e. essentially only for the ESA partner country tariffs upon imports from the EU-27 and the UK.

⁸⁸ UNCTAD Trade Analysis Information System.

⁸⁹ World Integrated Trade Solution

⁹⁰ Customs duty calculator

In addition, the following assumptions apply:

- The model is run under perfect competition and in a static setup.⁹¹
- Neoclassical closure, in which unemployment is assumed not to be affected by trade policy.
- The EU is modelled in a 27member state (MS) post-Brexit configuration.⁹²

As concerns tariff eliminations and reductions, the EU would not enjoy any preferential market access to the ESA partners in case of no EPA, as would Mauritius on the EU market is an upper-middle-income country. Zimbabwe would be eligible for preferences under the EU's GSP. Market access for Madagascar to the EU would essentially not change as in absence of the EPA, the country would still be eligible for duty-free, quota-free market access under EBA.

As concerns the modelling, the applicable preferential margin is added to tariffs in the database. This way, biases from erroneous protection data in the GTAP database were minimised.⁹³ It should be noted that reductions of non-tariff barriers (NTBs) were not simulated. The modelling results include estimates for changes in real GDP, bilateral trade by sector (for all goods), industry output by sector, consumer prices, wages by skill category and CO₂ emissions. For the interpretation of the results, the following aspects should be taken into consideration:

- GDP and trade volumes are expressed in real 2011 USD. These are converted into 2019 EUR in the excel file by using exchange rates for 2011 and the US GDP deflator as per the IMF WEO from October 2019.
- Output by sector is an indicator that can be used to capture which sectors turn out to have benefitted and which seem to have come under pressure. The absolute values should not be interpreted, as in the model they are expressed in base period real prices, which are no longer representative, not least due to the agreements themselves. The sum of the weighted average of output effects is not identical to the GDP effect. This is mainly because output contains intermediate products, which would be double (and triple..., etc.) counted if the output was simply added over sectors.
- Regarding the effects on consumers, the Fisher-CPI (consumer price index) has been calculated and the EPA's estimated impact on consumer prices both in the EU27 as well as in ESA4 countries is below the perception threshold.⁹⁴
- CO₂ emissions are given by the country. These are expressed in tons but based on input-output-coefficients from 2011, which might be quite outdated. Therefore, using absolute figures should be avoided and the relative changes should be communicated. The figures do not contain non-carbon greenhouse gases (GHG). This needs to be taken into consideration in the environmental impact assessment.

The model's underlying database, which comprises 57 sectors and 140 countries, was aggregated to 17 sectors and 11 regions. This aggregation was chosen such as to reflect sectors of key export interest to the ESA partner countries and countries which are assumed to be relatively strongly affected by the EPA, in particular, other regions benefitting from EPAs, as well as Turkey and the group of Least Developed Countries. The regional and sector aggregation chosen for this analysis are presented in Table 16 and Table 17.

⁹¹ A dynamic ex-post analysis, while theoretically feasible, would involve a number of methodological and data problems.

⁹² It should be noted that the UK, which is simulated as an individual country is copying EU-27 trade policies, which, as this is a simulation of the past, should be a rather uncontroversial modelling choice.

⁹³ Tariffs were not re-introduced by imposing final rates in the model. If this were done, the preferential margins could be severely over- or underestimated in case of errors in the GTAP database, which are known to occur.

⁹⁴ The Fisher Price Index, also called the Fisher's Ideal Price Index, is a consumer price index (CPI) used to measure the price level of goods and services over a given period. The Fisher Price Index is a geometric average of the Laspeyres Price Index and the Paasche Price Index.

Table 16: Regional disaggregation of the CGE model

Model region acronym	Description
EU27	
MDG	Madagascar
MUS	Mauritius
ZWE	Zimbabwe
SSA	Rest of Sub-Sahara Africa
LDC	Least Developed Countries
CAR	CARIFORUM
UK	
TUR	Turkey
HIC	Other High-Income countries
ROW	Rest of the world

Source: DG Trade, GTAP database.

Table 17: Sectoral disaggregation of the CGE model

Model sector acronym	Description
v_f	Fruit, vegetables, buts
SUGAR	Sugar and sugar crops
ocr ⁹⁵	Other crops
oap	Other animal products
SEAFOOD ⁹⁶	Fisheries and processed fish
AGRIFOOD	Agri-food sectors n.e.c. (cereals, dairy, meat, fibres, vegetables oil), forestry
PRIM	Fossil fuels
omn	Mining
tex	Textiles
wap	Wearing apparel
i_s	Iron and steel
nfm	Non-ferrous metals
ome	Other (than electric) machinery
omf	Other manufactures
MANUF	Manufactures n.e.c. (transport equipment, chemicals, electrical machinery, petrochemicals, leather products, lumber, paper)
TRNS	Transport services: air, water, other
SERV	Services other than transport and utilities

Source: Source: DG Trade, GTAP database. Sectors in the original GTAP database are written in lowercase letters. Sectors that have been aggregated are written in UPPERCASE letters.

⁹⁵ Includes vanilla and tobacco, which are important export commodities for MDG and, respectively, ZWE.

⁹⁶ Made up of the fisheries (fsh) and the "other food" (ofd) sectors in the GTAP database. The latter covers a large and diverse array of processed food products ranging from fruit juices to bakery products (no animal products, though). However, where ESA exports are concerned, the label seafood is a rather accurate description.

PE analysis (for Seychelles)

The PE model applied for the impacts assessment for Seychelles is based on Balistreri and Rutherford (2013). The model was run in a perfect-competition set-up and populated with data for the EU27, the UK, Seychelles, and the rest of the world. The model is specified with trade and tariff data only, i.e. domestic (feedback) effects can only be analysed implicitly.

It should be noted that PE models are generally limited as concerns the output and interaction of economic variables. Accordingly, the model applied for Seychelles does not account for macroeconomic effects, i.e. the impact of the EPA on GDP, factor markets, aggregate price level, etc. The potential effects of these variables and their interaction with individual product markets were not taken into consideration, respectively. Furthermore, no cross-price effects were considered. Despite being partial, the model closes the world market for each product under analysis by including a rest-of-the-world aggregate.

The model was run for goods only, using a General Algebraic Modeling System (GAMS) with UN COMTRADE data for 2018.⁹⁷ As in the CGE analysis, the impact of the EPA was analysed by re-introducing tariffs to the counterfactual levels. The counterfactual for both EU imports from and EU exports to the Seychelles are the respective MFN tariffs. The PE model is providing a snapshot of the situation in 2018 by comparing the observed trade flows under the EPA with a situation in which MFN tariffs would be levied by both sides.

Modelling results

Below we enclose some of the key modelling results we refer to in Chapter 5.

Table 18: Projected changes in industry output

Changes in industry output	EU27	Madagascar	Mauritius	Zimbabwe
Agri-food, forestry	0.0%	-0.1%	-1.3%	0.0%
Fruit, vegetables, nuts	0.0%	0.0%	2.1%	2.4%
Sugar and sugar crops	-0.4%	0.0%	52.1%	1.4%
Other crops (e.g. vanilla in MDG, tobacco in ZWE)	0.0%	0.1%	-1.0%	0.7%
Other animal products (mainly live pigs and poultry)	0.0%	-0.1%	-0.3%	0.1%
Fisheries and processed fish	0.0%	0.1%	10.2%	0.1%
Fossil fuels	0.0%	0.1%	n.a.	0.0%
Mining	0.0%	0.1%	-2.8%	-0.1%
Textiles	0.0%	1.1%	6.3%	-0.1%
Wearing apparel	0.0%	2.7%	5.7%	0.1%
Manufactures n.e.c.	0.0%	-0.9%	-3.0%	-0.1%
Iron and steel	0.0%	2.0%	-1.7%	-0.1%
Non-ferrous metals	0.0%	5.2%	-3.0%	-0.2%
Machinery and equipment	0.0%	1.8%	-5.6%	-0.4%
Other manufacturing	0.0%	-0.4%	-0.4%	0.0%
Services other than transport	0.0%	0.0%	-0.6%	0.0%
Transport services	0.0%	0.2%	-0.8%	0.0%

Source: DG Trade estimations.

⁹⁷ 2019 data are not yet available at a comprehensive level.

Table 19: Projected changes in bilateral EU exports due to the EPA

Bilateral EU exports to	Madagascar	Mauritius	Zimbabwe
Agri-food, forestry	9%	30%	4%
Fruit, vegetables, nuts	-1%	6%	6%
Sugar and sugar crops	5%	39%	1%
Other crops (e.g. vanilla in MDG, tobacco in ZWE)	0%	0%	2%
Other animal products (mainly live pigs and poultry)	0%	2%	0%
Fisheries and processed fish ⁹⁸	0%	18%	5%
Mining	0%	13%	0%
Textiles	31%	105%	33%
Wearing apparel	111%	141%	7%
Manufactures n.e.c.	47%	34%	15%
Iron and steel	26%	38%	44%
Non-ferrous metals	34%	98%	15%
Machinery and equipment	10%	29%	1%
Other manufacturing	44%	81%	19%
Services other than transport	-1%	2%	0%
Transport services	-1%	1%	0%

Source: DG Trade estimations.

Table 20: Bilateral EU imports from

Bilateral EU imports from	Madagascar	Mauritius	Zimbabwe	LDCs
Agri-food, forestry	1%	75%	49%	0%
Fruit, vegetables, nuts	0%	11%	21%	0%
Sugar and sugar crops	0%	1354%	845%	-5%
Other crops (e.g. vanilla in Madagascar, tobacco in Zimbabwe)	1%	29%	27%	0%
Other animal products (mainly live pigs and poultry)	0%	-1%	0%	0%
Fisheries and processed fish ⁹⁹	0%	109%	40%	0%
Fossil fuels	0%	n.a.	n.a.	0%
Mining	0%	0%	0%	0%
Textiles	3%	103%	38%	0%
Wearing apparel	3%	101%	85%	0%

⁹⁸ In the modelling, this sector contains also a lot of other processed food products, but where the ESA partner countries are concerned, there is little more than seafood in that sector.

⁹⁹ In the modelling, this sector contains also a lot of other processed food products, but where the ESA partner countries are concerned, there is little more than seafood in that sector.

Manufactures n.e.c.	2%	16%	1%	0%
Iron and steel	2%	7%	1%	0%
Non-ferrous metals	5%	17%	0%	0%
Machinery and equipment	3%	8%	-1%	0%
Other manufacturing	2%	15%	0%	0%
Services other than transport	1%	-2%	0%	0%
Transport services	1%	-1%	0%	0%

Source: DG Trade estimations.

Table 21: Top 20 EU27 exports to Seychelles, by post-EPA export value

Description	Tariff line	EU27 exports to Seychelles, in 1,000 EUR	Share in total exports	Estimated growth
Frozen tunas of the genus "Thunnus" (excl. Thunnus alalunga, Thunnus albacares, Thunnus obesus, Thunnus thynnus, Thunnus orientalis and Thunnus maccoyii)	30349*	119,826	47%	0%
Vessels for pleasure or sports; rowing boats (excl. motorboats and motor yachts powered other than by outboard motors, sailboats and yachts with or without auxiliary motor and inflatable boats)	890399	14,444	6%	197%
Sailboats and yachts, with or without auxiliary motor, for pleasure or sports	890391	8,817	3%	56%
Base metal stoppers, caps and lids (o/than crown corks), threaded bungs, bung covers, seals, other packing accessories and parts	830990	6,953	3%	27%
Cans of iron or steel, of a capacity of < 50 l, which are to be closed by soldering or crimping (excl. containers for compressed or liquefied gas)	731021	3,888	2%	0%
Iron/nonalloy steel products	721090	2,950	1%	51%
Sunflower-seed or safflower oil and their fractions, whether or not refined, but not chemically modified (excl. crude)	151219	2,219	1%	55%
Iron/nonalloy steel products	721070	2,064	1%	34%
Tinplate, articles nesoi	732690	1,979	1%	367%
Boards, panels, consoles, desks, cabinets and other bases, equipped with apparatus for electric control	853720	1,963	1%	226%
Edam and gouda cheese	40690	1,862	1%	257%

Description	Tariff line	EU27 exports to Seychelles, in 1,000 EUR	Share in total exports	Estimated growth
Parts of airplanes and helicopters, nesoi	880330	1,375	1%	0%
Frozen meat of swine (excl. carcasses and half-carcasses, and hams, shoulders and cuts thereof, with bone in)	20329	1,340	1%	0%
Yogurt products	40310	1,331	1%	163%
Medical equipment	901890	1,269	0%	0%
Nursing equipment	392690	1,224	0%	329%
Dishwashing equipment	842290	1,123	0%	30%
Parts suitable for use solely or principally with compression-ignition internal combustion piston engine "diesel or semi-diesel engine", n.e.s.	840999	1,031	0%	0%
Medicaments	300490	986	0%	329%
Butter products	40510	982	0%	251%
Total EU exports to Seychelles, post-EPA		254,151	70%	26%

* Trade data published by Seychelles deviate substantially from Eurostat data.

Source: Eurostat.

Table 22: Top 20 Seychelles exports to EU27, by post-EPA export value

Description	Tariff line	Seychelles exports to EU27, post-EPA, in 1,000 EUR	Share in total exports	Estimated growth
Prepared or preserved tunas, skipjack and Atlantic bonito, whole or in pieces (excl. minced)	160414	165,541	71%	32710548%
Frozen yellowfin tunas "Thunnus albacares"	30342	23,010	10%	119%
Frozen skipjack or stripe-bellied bonito "Euthynnus -Katsuwonus- pelamis"	30343	14,843	6%	109%
Light oils and preparations, of petroleum or bituminous minerals which $\geq 90\%$ by volume "incl. losses" distil at 210°C "ASTM D 86 method" (excl. containing biodiesel)	271012	7,513	3%	38%
Frozen bigeye tunas "Thunnus obesus"	30344	6,726	3%	112%
Products containing meat of crustaceans, molluscs or other aquatic invertebrates, prepared meals	160420	3,100	1%	603403%

Description	Tariff line	Seychelles exports to EU27, post-EPA, in 1,000 EUR	Share in total exports	Estimated growth
Fresh or chilled yellowfin tunas "Thunnus albacares"	30232	2,824	1%	121%
Mirrors and reflectors used in medical, surgical, dental or veterinary sciences, and parts and accessories thereof	901890	2,363	1%	0%
Fresh or chilled fillets of fish, n.e.s.	30449	1,203	1%	3814023%
Printed circuits, without elements (other than connecting elements) fitted thereon	853400	948	0%	0%
Cod oil and its fractions, other than liver oil	150420	898	0%	74%
Copper spent anodes; copper waste & scrap containing less than 94% by weight of copper	740400	472	0%	0%
Air conditioning machines incorporating a refrigerating unit and a valve for reversal of the cooling-heat cycle "reversible heat pumps" (excl. of a kind used for persons in motor vehicles and self-contained or "split-system" window or wall air conditioning machines)	841581	430	0%	14%
NA	99SSS9	342	0%	0%
Fresh or chilled fillets of swordfish "Xiphias gladius"	30445	283	0%	9853853%
Fresh or chilled bigeye tunas "Thunnus obesus"	30234	247	0%	119%
Parts of seats nesoi, for seats of a kind used for motor vehicles	940190	213	0%	20%
Salt & pure sodium chloride, whether or not in aqueous solution or cont. added anticaking or free-flowing agents; seawater	250100	194	0%	20%
Frozen fillets of tuna "of the genus Thunnus", skipjack or stripe-bellied bonito "Euthynnus [Katsuwonus] pelamis"	30487	186	0%	274%
Fresh or chilled fish, n.e.s.	30289	164	0%	131%
Total Seychelles exports to EU27, post-EPA		233,760	99%	573%

Source: Eurostat.

Data gaps

For ESA4 trade with the EU27, we provide Eurostat trade statistics denominated in EUR. For the sake of comparability concerning trade with non-EU jurisdictions, we also provide to UN Comtrade data for trade in goods. This allows us to analyse the relative performance of goods trade between ESA4 countries and the EU and the performance of goods trade between ESA4 countries and other jurisdictions, i.e. the rest of the world (excluding the EU27), the East African Community (EAC), SADC and the COMESA. It should be noted that import and exports statistics for ESA4 countries are patchy. Both UN Comtrade and Eurostat data are fragmentary for HS 2 and HS 4 product codes and subject to inconsistencies between product-specific and overall goods trade volumes. Note also that investment data available, both for investment stocks as well as investment flows between the EU and ESA4 countries, is scarce.

Approach to social, human rights and environmental impacts

These three areas of assessment – social, human rights and the environment – are closely linked, and are also closely linked to the assessment of economic impacts. For all three, the assessment follows the Commission's SIA Guidelines, the guidelines for the human rights impacts in SIAs and the Better Regulation Toolbox. Indications for each of these three areas presented in the following sub-sections. The three areas of impacts are assessed in both the brief ex-post evaluation (Task 9) and the SIA (Tasks 13 to 15). The approach for all three follows a common sequence: A. Screening and scoping; B. Detailed assessment; C. Conclusions and recommendations.

Screening and scoping builds on the preliminary screening. The screening reviews initial results in that work concerning the trade measures that are likely to have the largest social, human rights and environmental impacts, drawing on further literature to build more detailed causal analysis. The scoping work in turn looks at the details of specific trade measures, building on the preliminary analysis. This work reviews the identification of key economic sectors for attention, as well as the most important social, human rights and environmental issues for analysis.

The *detailed assessment* draws on the study's information gathering work, including literature and data gathering, economic modelling, consultation results and case studies. The assessment identifies impacts compared to the baseline: for the SIA, this baseline is developed based on the results of the ex-post evaluation, which develop the understanding of existing social, human rights and environmental conditions.

The *conclusions and recommendations* for the SIA are presented in the report on Trade and Sustainable Development. Results will also be presented in the six different thematic reports. For a proportionate analysis, we expect to provide a more in-depth analysis for the thematic reports on 1) Trade in Goods, and 2) Trade in Services, Digital Trade and Investment (in addition to the report on Trade and Sustainable Development).

Social impacts

In line with the Commission's SIA guidelines, the social analysis is based on broadly two pillars: first, an analysis of impacts of trade and economic chapters on key areas related to the social SDGs; second, an analysis of the social provisions of the TSD chapter, in particular concerning the implementation of ILO Conventions and other international policy tools, such as internationally agreed principles and guidelines on corporate social responsibility (CSR) and responsible business conduct (RBC), such as the UN Guiding Principles on Business and Human Rights.

The detailed assessment draws on stakeholder views on the relevance of the different areas of social development as well as on the magnitude of potential impacts. To the extent possible, modelling results are used to identify potential impacts. Data is gathered and assessed for indicators related to employment (job creation or losses), working conditions (wages, working standards, OSH, social dialogue), equality and non-discrimination, vocational training/re-training/lifelong learning and distribution of income and social protection,

in line with the SIA guidelines. To the extent possible, the assessment sought to identify impacts by key groups (such as women and children) and to identify winners and losers. As far as possible, the indicators were chosen from the UN's SDG indicator framework,¹⁰⁰ especially for SDGs 1,2,5,8 and 10. If available, data is presented by sector, skill level and gender. Additionally, we look more closely at the implementation of labour policy (e.g. adoption/revision of labour laws, labour inspections, institutional aspects), in particular, the cases identified in the NORMLEX database (see section 5 and Annex X, which provides an example of this type of analysis).

Human rights impacts

The further screening and scoping builds on the preliminary results (see section 5) to help further understand: a) which rights are more directly trade-related and likely to be directly affected by the trade measures b) which are the major vs. minor impacts of the selected measures; c) which measures have a beneficial or negative impact on human rights; d) which segments of the population (women, indigenous people and ethnic groups, etc.) are more likely to be impacted. In doing so, both the Fundamental Rights Checklist in Tool No. 28 of the Better Regulation Box and the SIA human rights guidelines are used. The detailed assessment draws on a range of information. The stakeholder consultation together with the case study results are expected to be key sources.

Environmental impacts

The analysis of environmental impacts, as per the SIA Handbook,¹⁰¹ considers several key dimensions: *scale* and *structural* effects; and *technology* effects (alongside which we propose to add *environmental management* effects); plus *governance* effects, also added to the dimensions set out in the Handbook.

The assessment of *scale* and *structural* effects draws on the economic analysis, in particular the identification of key sectors that could be affected by the deepening of the EPA. The SIA handbook refers to *technology* effects as 'those affecting the processes or production methods. We understand these to include access to process equipment as well as *environmental management* techniques. New equipment and methods could be more efficient, economically, and new methods may be introduced to improve access to higher-value EU markets, such as those for organic agriculture and food products. EU investment can be a driver for technology and management effects, and EU development cooperation could also play a role. We sought information on possible technology effects via the literature review and in particular draw on the consultation results for information on the extent to which agreements with the EU, ongoing trade with the EU and FDI from EU-based enterprises are improving the environmental efficiency of production in ESA countries.

The analysis of *governance* effects considers two areas. First, for multilateral environmental agreements (MEAs), the preliminary screening (see section 5 and Annex X) shows that the ESA5 countries have ratified many of the main MEAs commonly set out in EU trade and partnership agreements.

¹⁰⁰ UN General Assembly (2017). Resolution adopted by the General Assembly on 6 July 2017. 71/313. Work of the Statistical Commission pertaining to the 2030 Agenda for Sustainable Development. A/RES/71/313.

¹⁰¹ European Commission, Handbook for trade sustainability impact assessment (second edition), April 2016

Annex IV. Intervention Logic and Evaluation Matrix

The European Commission has developed a preliminary intervention logic for the EPA in the Terms of Reference for this assignment, which we have revised based on the kick-off meeting and consultations with EU officials (such as the EU Delegations in the ESA5 countries). To represent this evolution visually, see figure below, the cells in grey represent elements in force already under the current agreement (and therefore subject to the ex-post evaluation), while cells in light blue represent new elements, part of the deepening process (and therefore subject to the SIA), while cells in green represent elements in place already under the current agreement, but to be reinforced under the deepening process.

Figure 13: Intervention logic

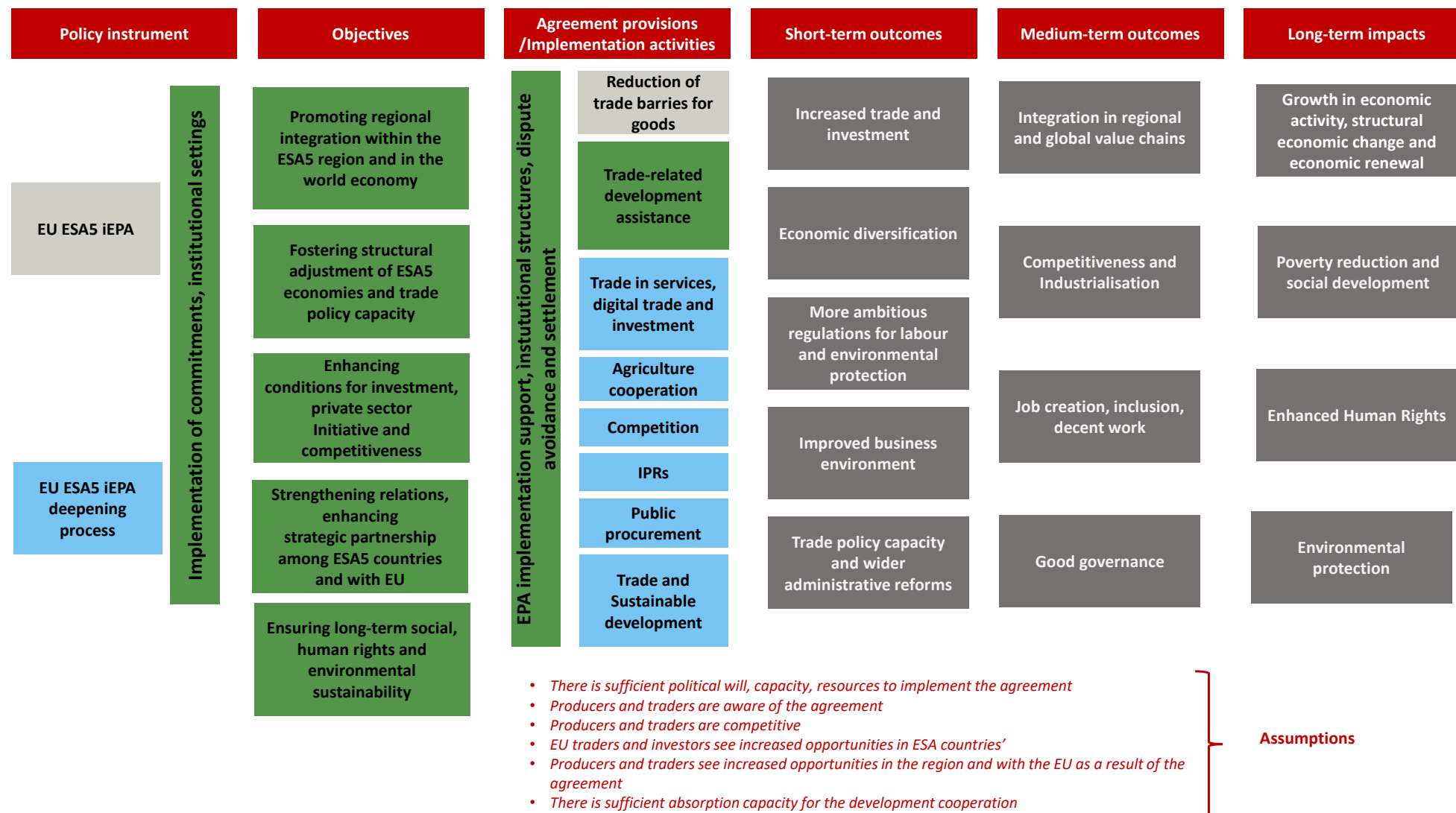


Table 23: Evaluation Matrix

Evaluation questions	Judgement criteria	Indicators	Sources
Effectiveness			
To what extent have the objectives of the existing interim EPA been achieved?	<p><u>Economic impacts</u></p> <ul style="list-style-type: none"> ▪ Extent to which bilateral trade has developed between the EU and ESA countries; ▪ Extent to which overall trade has developed between the EU and ESA countries ▪ Extent to which economic growth and diversification have developed as a result of the interim EPA; ▪ Extent to which poverty has reduced as a result of the interim EPA ▪ Extent to which foreign investments have increased as an effect of the interim EPA; ▪ Extent of fiscal improvements as an effect of the interim EPA; ▪ Extent to which <u>governance and business environment</u> have improved as an effect of the interim EPA (especially for SMEs) ▪ Extent to which <u>consumer</u> prices and safety have improved in ESA countries as an effect of the interim EPA; ▪ Extent to which product variety and quality have improved as an effect of the interim EPA; ▪ Effects on <u>regional integration</u> and third parties: effects on regional integration in the ESA region, under e.g. COMESA, SADC or AfCFTA, effects on EU's outermost regions and LDCs. <p><u>Social impacts</u></p>	<p><u>Economic impacts:</u> Results of the analysis for the following tasks:</p> <ul style="list-style-type: none"> ▪ Analysis of the level of tariff liberalisation, utilisation of market access tariffs, analysis of trade barriers (from task 6) ▪ Evolution of application of RoO (from task 7) ▪ Evolution of trade in goods overall and for the ESA5 countries individually (from task 8) ▪ Overall economic impacts: key macroeconomic and sectoral variables (from task 9) ▪ Evolution of FDI between EU and ESA5 countries (from task 9) ▪ Impact on diversification of bilateral trade (from task 8) ▪ Impact on Consumer (consumers' quality and protection, product variety and quality) (from task 10) ▪ Impact on budget and fiscal of the EU and partner countries: budgetary effects, reduction of dependence on tariff revenues and revenue diversification (from task 10); ▪ Impacts on regional integration (from tasks 8, 9 and 10) <p><u>Social impacts:</u> Results of the analysis of the following tasks</p>	<p><u>Sources:</u></p> <ul style="list-style-type: none"> ▪ Interviews ▪ Desk research ▪ Stakeholders consultations ▪ Results from the CGE model

Evaluation questions	Judgement criteria	Indicators	Sources
	<ul style="list-style-type: none"> ▪ Extent to which employment, jobs and wages have improved as an effect of the interim EPA (per gender per socio-demographic group, including vulnerable groups, when available); ▪ Extent to which inequality and poverty have reduced as an effect of the interim EPA (per gender per socio-demographic group, including vulnerable groups, when available); ▪ Extent to which labour rights, labour standards and working conditions have improved as an effect of the interim EPA (per gender per socio-demographic group, including vulnerable groups, when available); ▪ Extent to which respect of human rights has improved as an effect of the interim EPA (per gender per socio-demographic group, including vulnerable groups, when available); ▪ Extent to which women's conditions have improved as an effect of the interim EPA. <p><u>Impacts on environment and climate</u></p> <ul style="list-style-type: none"> ▪ Extent to which respect of environmental standards has improved as an effect of the interim EPA 	<ul style="list-style-type: none"> ▪ Assessment of trade-related development assistance to ESA5 countries (from task 10) ▪ Institutional structure established by or resulting from the interim EPA (from task 10) ▪ Develop an analysis of the effects on poverty in ESA5 countries (from tasks 9 and 10) ▪ Impacts on Informal Economy and Informal Employment (from tasks 9 and 10) ▪ Impact on gender inequality (from task 9) ▪ Identify and assess measures that have enhanced or impaired enjoyment of specific human rights (from tasks 9 and 10) ▪ Identify individuals or specific groups most affected by the effects of the interim EPA implementation (from tasks 9 and 10) <p><u>Environmental impacts</u> on EU and ESA5 countries, Results of the analysis of the following tasks (from tasks 9 and 10), including:</p> <ul style="list-style-type: none"> ▪ exports and investments in sectors such as agriculture, mining and forestry ▪ natural resources and biodiversity ▪ key environmental parameters (soil, water, forestry, air, etc.) ▪ climate, in particular, GHG and air pollution changes (carbon footprint) ▪ better implementation and enforcement of environmental policy and legislation 	

Evaluation questions	Judgement criteria	Indicators	Sources
Has the EPA with ESA4 given rise to unintended consequences? (<i>related to task 11</i>)	<ul style="list-style-type: none"> What social, human rights, environmental and/or economic impacts have resulted from the interim EPA which were not intended by the agreement? Have there been any positive unintended effects? Have there been any negative unintended effects? 	<ul style="list-style-type: none"> resource efficiency, greening and decarbonisation Identification of effects of the interim EPA on the environment, labour or human rights; Identification of positive/negative side effects of the Agreement in the EU, ESA5 countries and third countries; Results from tasks 6-11, and in particular: <ul style="list-style-type: none"> Assess whether and to what extent impacts identified in the preparatory phase of the interim EPA have taken place; Evaluation of awareness of the interim EPA, and obstacles to the implementation of the interim EPA (from task 6) Impact on gender inequality; Identification of stakeholder groups that have been affected by the Agreement in an unintended manner 	<ul style="list-style-type: none"> Interviews Desk research Stakeholders consultations Results of tasks 6-10
Which sectors, activities, groups or countries in ESA4 have benefited most as a result of the EPA and which ones have incurred losses due to the EPA? (<i>related to task 11</i>)	<ul style="list-style-type: none"> Extent to which some sectors, activities or groups in ESA4 countries have benefited most from the interim EPA? Extent to which some sectors, activities or groups in ESA4 countries have benefited less from the interim EPA? 	<ul style="list-style-type: none"> Identification and comparison of transfers and net effects of the interim EPA on specific sectors, activities or groups (from tasks 9 and 10) 	<ul style="list-style-type: none"> Desk research' Interviews Stakeholders consultation Results of tasks 6-10
What good practices and lessons learned on EPA implementation on both the ESA and the EU side?	<ul style="list-style-type: none"> Provisions and/or implementation measures that have proved most effective/efficient/relevant in the EU and the ESA5 countries' 	<ul style="list-style-type: none"> Identification and analysis of provisions and/or implementation measures that have proved most effective/efficient/relevant in the EU and the ESA5 countries 	<ul style="list-style-type: none"> Interviews Desk research Stakeholders consultations Results of tasks 6-10 Results of evaluation questions for efficiency, relevance and coherence

Evaluation questions	Judgement criteria	Indicators	Sources
Efficiency			
To what extent has the interim EPA been efficient with respect to achieving its objectives?	<ul style="list-style-type: none"> What costs have been involved in the implementation of the interim EPA (e.g. forgone tariff revenue, costs of committees/working groups)? How do these costs compare to the benefits, e.g. in terms of GDP increases, increases in employment and salaries? Extent to which the costs and benefits associated with Agreement are shared proportionately among the different stakeholders' groups and interests 	<ul style="list-style-type: none"> Identification of input and cost types related to the implementation of the interim EPA Calculation of economic impact of the implementation of the interim EPA Analysis of the tariff PUR Estimation of overall budgetary consequences of the agreement by considering effects of GDP, forgone tariff revenues due to tariff reductions, and changes in trade volumes with other trade partners Results of the analysis of the following tasks: <ul style="list-style-type: none"> Overall economic impacts: key macroeconomic and sectoral variables Evolution of trade in goods and FDI between EU and ESA5 countries; Impact on diversification of bilateral trade Impact on budget of the EU and partner countries Identification of the costs associated with the Agreement; Identification of the costs and benefits related to the Agreement assumed by the different stakeholders' groups Results of the analysis of the following tasks (and sub-tasks): <ul style="list-style-type: none"> Task 10 Impact on Consumers Task 10 on social impacts 	<p><u>Sources:</u></p> <ul style="list-style-type: none"> Interviews Desk research Stakeholders consultations

Evaluation questions	Judgement criteria	Indicators	Sources
Are there unnecessary regulatory costs (including administrative burden)?	Extent to which the interim EPA has not brought additional/unnecessary costs, including administrative burden, or reduced administrative and regulatory costs	<ul style="list-style-type: none"> Results of the analysis of the following task: <ul style="list-style-type: none"> Evaluation of awareness of the interim EPA, and obstacles to the implementation of the interim EPA (from task 6) impact of customs and trade facilitation-related provisions on simplification for producers, exporters, forwarders and customs administration (tasks 6 and 7) 	<p>Sources:</p> <ul style="list-style-type: none"> Interviews Desk research Stakeholders consultations
Relevance			
To what extent do the provisions of the interim EPA are relevant to address the current trade needs and issues of the EU and ESA5 countries?	<ul style="list-style-type: none"> What are the current trade issues faced by the EU and ESA5 countries? Extent to which the Agreement can be used to address these issues Number and importance of issues that are unlikely to be addressed by the Agreement Extent to which development cooperation can be used to address current trade and development issues. 	<ul style="list-style-type: none"> Identification of key trade issues and barriers not arising from non-implementation currently faced by the EU, and ESA5 countries, by sector and type of barrier Stakeholders' opinions concerning the possibility of the interim EPA to address the current issues Stakeholders' opinions on issues that may not be resolved through the interim EPA, and their importance Evaluation of awareness of the interim EPA, and obstacles to the implementation of the interim EPA (from task 6) 	<ul style="list-style-type: none"> Interviews Desk research Stakeholders consultations
What are the shortcomings of the existing EPA that need to be addressed in the deepening negotiations?	<ul style="list-style-type: none"> Extent to which the current interim EPA leaves some needs of EU and/or ESA5 countries unmet Extent to which the current interim EPA does not cover relevant sectors or activities 	<ul style="list-style-type: none"> Identification of key trade issues and barriers not arising from non-implementation currently faced by the EU, and ESA5 countries, by sector and type of barrier 	<ul style="list-style-type: none"> Interviews Desk research Stakeholders consultations Results of tasks 6-10

Evaluation questions	Judgement criteria	Indicators	Sources
Coherence			
To what extent has the interim EPA been coherent with other policy instruments of the EU affecting the ESA region and other partners	<ul style="list-style-type: none"> • Extent to which objectives of the interim EPA align with the principles of current EU trade policy (e.g., concerning GSP countries) • Extent to which objectives of the interim EPA align with the principles of current EU trade policy in the ESA region; • Extent to which there are contradictions between the interim EPA and other EU policy instruments in the ESA region (e.g. development cooperation policies) ; 	<ul style="list-style-type: none"> • Reviewing provisions of the interim EPA; • Identification of areas of (lack of) coherence between the interim EPA and EU trade and development policies <ul style="list-style-type: none"> ○ Number and type (and possibly extent) of contradictions; ○ Number and type (and possibly extent) of synergies. • Identification of areas of (lack of) coherence between the interim EPA and EU trade and development policies in the ESA region <ul style="list-style-type: none"> ○ Number and type (and possibly extent) of contradictions; ○ Number and type (and possibly extent) of synergies 	<p><u>Sources</u></p> <ul style="list-style-type: none"> ▪ Interviews ▪ Desk research ▪ Stakeholders consultations

Source: Own compilation

Annex V: Stakeholder Consultations

During Phase II of the contract, the team implemented the following components of the stakeholder consultation.

1. Setting up a website and a Twitter account
2. Interviews in ESA4 and Comoros
3. Online questionnaire
4. Update to strategy going forward

Website and Twitter account

A dedicated project website in English and French provides information on the progress of work and allows interaction with civil society and all other relevant stakeholders.

Figure 14: Consultation website



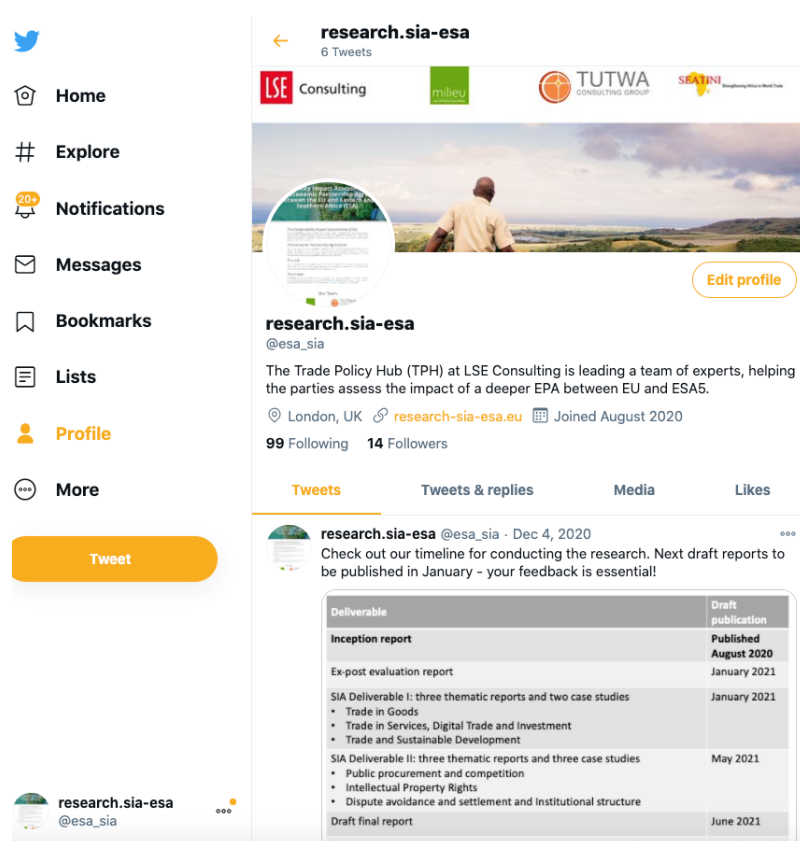
Source: <http://research-sia-esa.eu/en/>

The website can be accessed at the following web address: <http://research-sia-esa.eu/en/>. The website provides an easily accessible summary of the evaluation and SIA process, information on past and upcoming consultation events and a feedback mechanism. All final reports will be made public on the website. Other relevant outputs, including regular updates on the SIA process and findings and documentation sources, will

be published on the SIA website. Moreover, the website will contain a feed for the project Twitter account. All meetings with civil society (in the EU and ESA partner states) will be appropriately announced on the SIA website. Traffic on the website (including the country of origin of viewers) will be tracked using Google Analytics. This will be done in a manner that protects personal data and adheres to data protection rules.

The project also has its own Twitter page. We use Twitter to follow all of the following: Ministries of ESA5 countries, representations of international organisations, representations of NGOs and local NGOs, embassies and consulates of key trading partners, as well as experts on Africa and the region. We also provide updates on timelines, deliverables and possibilities for engagement with the team.

Figure 15: Twitter account



Source: Twitter

Interviews

The key consultation tool is one-on-one interviews, in person, via phone and online tools. To ensure that information and evidence is gathered from relevant stakeholders, the team prioritised interviews conducted by in-country partners with vast networks and familiar with local communities. Each team in the five partner countries set a target to conduct approximately 20 interviews per country. While these numbers have been almost achieved for ESA5, the interviews in the EU and largest trading partners are lagging. We outline before how we plan to proceed.

Interview responses have been integrated throughout the whole text and within each of the deliverables, so this chapter serves to report on the number of interviews conducted, the stakeholders consulted, as well as the key findings for easy reference. The interview questionnaire can be found in our Inception Report.

Respondents

As a means of undertaking an informed Sustainability Impact Assessment (SIA) of the EU-ESA EPA to inform the deep EPA negotiations, the Southern and Eastern Africa Trade Information and Negotiations Institute (SEATINI)-Uganda, Dahari Comoros in partnership with the LSE undertook interviews with representatives of Government (Ministries, Departments and Agencies-MDAs); Civil Society Organisations; National Chambers of Commerce, Business Associations; Private Sector Economic Operators and Small Medium Enterprises (SMEs) from Madagascar, Seychelles, Zimbabwe and Madagascar and Comoros. Due to the novel COVID-19, interviews have so far been conducted digitally, using Zoom, WhatsApp and emails, and where possible face-to-face with protective measures. Due to the different extent of implementation in ESA4 and Comoros, we report the key findings separately. As of 18 January 2021, 91 respondents have been interviewed. These key findings have been integrated with the rest of the report.

Table 24: Interviews conducted by Jan 2021

Country	Category	No. Respondents
Zimbabwe (SEATINI)	CSOs	10
	Government MDAs	3
	National Chambers of Commerce, Business Associations	1
	Private Sector Economic Operators	7
	Small Medium Enterprises	2
Mauritius (SEATINI)	CSOs	4
	Government MDAs	4
	National Chambers of Commerce, Business Associations	1
	Private Sector Economic Operators	8
	Small Medium Enterprises	6
Seychelles (SEATINI)	CSOs	3
	Government MDAs	6
	National Chambers of Commerce, Business Associations	1
	Private Sector Economic Operators	5
	Small Medium Enterprises	5
Madagascar (SEATINI)	CSOs	2
	Government MDAs	2
	National Chambers of Commerce, Business Associations	0
	Private Sector Economic Operators	2
	Small Medium Enterprises	3
Comoros (Dahari)	CSOs	4
	Government MDAs and International Organisations	7
	Private Sector Economic Operators	5
Total No. of Respondents		91

Source: Own compilation

Key findings: ESA4 responses

1. CSO ORGANISATIONS

a. Role of CSOs organisation in relation to trade policy and agreements

Civil Society Organisations interviewed indicated that they play a critical role in influencing trade policy and agreements. Key of the tenets of role of CSOs include:

- Monitoring developments in the areas of trade, fiscal and related policies and processes to ensure that they generate a favourable environment that can be utilized to achieve equitable and sustainable development at national, regional and global levels.
- Provide a platform for stakeholders to deliberate on global, regional and national issues with a view of developing a consensus.
- Raise awareness, build long term capacity and bring into discourse the concerns of key stakeholders (i.e., Members of Parliament, private sector, the media, government agencies, Trade unions, Farmers' groups, women's groups, the youth, civil society movements) in trade, fiscal and related policies and processes at national, regional and global levels.
- Contribute to the fight for social justice, human rights (especially Economic, Social and Cultural Rights), democracy and good governance, without partisan, sectarian, gender, racist or sexist biases
- Network with academics, policymakers, NGOs and civil society movements concerned about the forces and effects of globalization on Africa and the Third World in general.
- Undertaking research and other knowledge products on trade policies and negotiations to inform the pro-development outcomes of the policies and negotiations.

b. Level of awareness of the existence of the existing interim EPA between the EU and the ESA5

The majority of the interviewed CSOs exhibited a low level of awareness of the interim EPA between the EU and ESA5. High levels of awareness were recorded from CSOs in Mauritius and Zimbabwe, whereas low levels of awareness were recorded from CSO respondents from Madagascar and Seychelles. According to respondents, high levels of awareness of the EU-ESA interim EPA is as a result of:

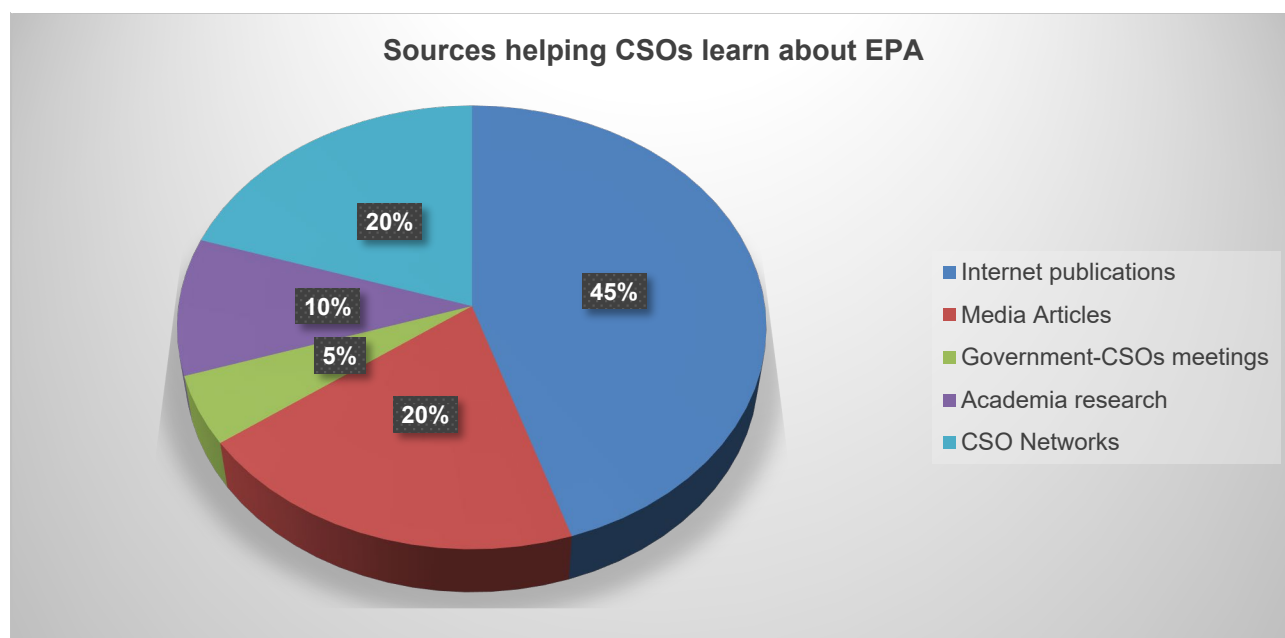
- Organisational strategic outlook, with the organisations working on Socio-Economic development issues including trade; investment; intellectual property; human rights; environment; climate change, debt and Agriculture.
- Membership in key Civil Society networks like Africa Trade Network; AFRODAD; Economic Justice Network; PACJA and Third World Network-Africa. These networks which work on trade and related issues have played a critical role in raising awareness and building the capacity of their members in research and advocacy on trade and trade-related policies and negotiations inclusive of the interim EPA.
- Networking with relevant Government Ministries Departments and Agencies (MDAs) like Ministries of Trade, Agriculture, Foreign Affairs, Revenue Authorities among others. Some of the CSOs like the Zimbabwe Council of Churches are often part of the Government Negotiating Team and are periodically consulted on issues like the interim EPA implementation.
- Media Articles and opinions on the interim EPA and Africa-EU relations and Post Cotonou Negotiations have also increased on CSOs awareness of the existence of the interim EPA.

On the other hand, documented reasons for low levels of CSO awareness of the existing interim EPA range from limited availability and publication of information on interim EPA; organisational focus on other core issues that do not prioritise trade; lack inclusion of CSOs in trade policies and processes like the interim EPA negotiations by their respective governments (limited appreciation by governments of the role of CSOs in Trade negotiations) and limited resources which from development partners (donors) who do not prioritise funding of trade advocacy. Regarding funding for CSOs Trade advocacy work, respondents indicated that there is a need for the EU Trade Advocacy Fund to focus on supporting CSOs in engaging in deep EPA negotiations and popularising the implementation of the interim EPA. Limited CSOs awareness of the negotiations was also visible from the fact that there was no single Civil Society Organisation from the ESA5 group that registered to participate in the recently concluded EPA Civil Society Dialogue on the negotiations to deepen the EU-ESA5 EPA.

c. Channels and sources helping CSOs to learn more about the EPA

From the respondent's submission, a number of channels and sources both print and digital have helped them learn more about the EPA, both the interim EPA and deep EPA negotiations. The sources vary from internet publications; national meeting organised by the government and CSOs, email and information exchanges among CSOs, media and research from academia. The internet, especially information on websites like EU; Bilaterals.org; SEATINI Zimbabwe; Economic Justice Network and Third World Network Africa remains the biggest source of information on EPA. Key to note is the low level of transparency among governments in publishing information on EPA, as they rank the lowest source of information on the EPA. This has not only affected effective CSOs engagement but has also led to the limited mobilisation of trade sector players like farmers and MSMEs to mobilize their production and take advantage of the opportunities therein interim EPA and pro-actively influence the ongoing deep EPA negotiations. Respondents revealed that these are the same channels and sources that they are using to keep track of the ongoing comprehensive EPA negotiations.

Figure 16: Pie chart showing the different sources of EPA information to CSOs.



Source: Own compilation from field data

d. Organisation's interest in the EPA between the EU and the ESA5; Comoros, Madagascar, Mauritius, Seychelles, and Zimbabwe?

The respondents noted that their interest in EU-ESA deep EPA negotiations is due to the fact that they are charged with standing for the promotion of people's socio-economic rights, and thus it is critical to ensure that the negotiations promote, rather than erode these rights. The organisations also work on ensuring that trade and fiscal policies and negotiations promote access to jobs, viable markets and access to services like health, medicine, education. This is because unless properly crafted, trade and fiscal policies and agreements can contain provisions that make it challenging for citizens to access viable markets and social services, due to strong intellectual property rights on patents and low safeguard measures, coupled with the high levels of liberalisation of goods and services often enshrined therein. Thus, to ensure that EPA negotiations improve the dignity of life of people in the ESA5, CSOs have become interested in the negotiations.

From the respondent's submissions, it was observed that there is an increasing interest in EPA negotiations by CSOs in Zimbabwe, Madagascar, Mauritius and Seychelles. Whereas Zimbabwe still leads in the number of CSOs working and following the negotiations, an impressive rise in CSOs from Madagascar and Seychelles engagement in EPA negotiations is critical to note. This was observed from the frequency of articles and blogs on the negotiations published by the CSOs; self-organised national consultative meetings on EPA negotiations; and incorporation of trade agenda by CSOs in their strategic and work plans. This has led to their increased interest in following, taking track and monitoring trade and investment issues between the EU and the ESA5 including the Post Cotonou Negotiations, the Compact with Africa (CwA) and Marshall Plan for Africa.

Important to also note, as per respondents, it was observed that the key social, human rights and gender aspects of interest in the EPA include their likely implications to (viable) jobs/employment; food security (which is largely a gender issue); access to viable markets; environmental protection; mutual recognition agreements among others.

Unlocking relations between Zimbabwe and EU: According to the CSOs, the EPAs are not simply viewed as a trade tool, but also essential processes for unlocking relations with the EU. This position can be inferred from the statement by the Government of Zimbabwe following the recent EU decision to suspend restrictive measures on Zimbabwe. Thus, by negotiating comprehensive EPA, Zimbabwe demonstrates being a good partner to the EU.

e. Level of awareness of negotiations (that are currently taking place) between the EU and ESA5 (Comoros, Madagascar, Mauritius, Seychelles, and Zimbabwe) for the deepening of the currently implemented EPA? These will result in a comprehensive EPA.

A number of respondents who are aware of the EU-ESA deep EPA negotiations raised a number of issues to qualify their levels of awareness. These include:

- **New rules being pushed by the EU:** Respondents noted that the EU has adopted a negotiating mandate for a deep EPA which is in line with her push for a Millennium Round in the World Trade Organisation (WTO)i.e. issues including services, investments, government procurement, trade facilitation, competition policy, IPR and electronic commerce among others. It should be noted that E-Commerce is on the comprehensive EPA agenda yet it is not being negotiated under the WTO.
- **The quest for pro-poor trade provisions and offers:** According to discussions with the Faith-based Organizations in the ESA region, churches under the banner of the "All Africa Council of Churches" played an important role in advocating for economic policies that are pro-poor in nature. At the core of the Churches, submissions were that any kind of economic policy including international trade policies should be first and foremost geared towards sustainable development and equitable growth, which

benefit the people. In a statement produced by the All Africa Council of Churches in 2019, churches are encouraging the EU to consider positions in the comprehensive EPA that should not be oppressive, but instead, be fair and just and serve the people.

- Key challenges for public authorities, business, and other relevant stakeholders, in the implementation of the EPA.

From the respondents, some of the documented challenges in the implementation of the EPA include:

- Infrastructure challenges among ESA5: Except for Seychelles, Madagascar, Comoros and Mauritius which have access to a sea coastline, Zimbabwe is the only country that is landlocked and faces infrastructure challenges ranging from poor roads, railway and ICT. This implies that whereas the rest of the ESA5 countries are enjoying the economies of scale, Zimbabwe gets challenged to break even.
- Majority of the ESA5 Private Sector and SMEs are deeply constrained to take opportunities presented in EPA due to their product quality and quantity constraints. With the businesses capacity utilization projected to drop to 27% in 2020 due to COVID-19, the business sector in the ESA5 is not strategically positioned to meaningfully export to the European market.
- Primary commodity dependence is another challenge facing the business sector in the ESA5. ESA5 countries are exporting primary commodities to the EU e.g., Zimbabwe (peas, Macadamia nuts, Tanganda); Seychelles (Fish & fish products); Mauritius (fish, sugar and sugar confectionery, articles of apparel); Madagascar (Coffee, Vanilla, tea, spices, ores, clothing). It is the private sector and Civil Society belief that unless this is tackled, the comprehensive EPA will cement colonial relationships between the EU and ESA5, where the latter will be a producer of primary commodities, hence will not unlock transformation of the industries.
- For Civil Society and the private sector in the ESA5, information dissemination is also a major challenge. Whereas CSOs are often not privy to the EPA negotiations, the private sector is not aware of the provisions of the EPA. This is due to the fact that often, the governments negotiate with little information/inputs of the industry, and whenever it engages these actors, it is on an ad hoc basis which gives less time for meaningful input. The private sector and a number of civil society actors are also detached from negotiations because of their technical nature as well as deep mistrust and fatigue gave the tendency of their respective governments to ignore the positions of the private sector and civil society actors.
- Perceptions on the overall effect of the comprehensive EPA between the EU and the ESA5 countries?

Respondent's perceptions on the overall effect of the comprehensive EPA between the EU and the ESA5 countries revealed hope that the EPA will bring positive/favourable impacts to the ESA5 economies especially in trade in goods. Agricultural goods; forest products; marine resources are some of the ESA5 exports which are expected to define this market access, should the market access provisions of the deep EPA be fairly crafted.

Concerns were raised on the perceptions that in terms of trade in services and new issues like government procurement, intellectual property, digital trade and Investment, the EU stands to benefit more (very favourable/very positive) than the ESA5. Reasons for this stand include limited levels of competitiveness of ESA5 in these areas; a small and weak ESA5 private sector in these areas, and concentration of ESA5 exports in agricultural and marine resources.

Whereas pockets of respondents indicated adverse effects of the EPA on the economies of ESA5, they also stressed that these negative implications can be mitigated through inclusive negotiations, that should be tied on content rather timelines and taking a multi-stakeholder approach; and organising the production and

productivity aspects of the ESA5 private sector and MSMEs to take advantage of the expected market access opportunities therein the deep EPA.

Table 25: Perceptions of ESA4

	Very favourable/ very positive	Favourable/ positive	No effect	Adverse/ negative	Very adverse/ very negative	I don't know
For the ESA5						
For the EU						
Overall						

Source: Own compilation

Specifically, a number of likely effects of the EPA on ESA5 Countries were documented and include:

- **One Agreement to rule them all:** Respondents pointed out that the EU was the first rich country block to launch reciprocal FTA's (dubbed EPAs) with LDCs in 2002. It is now the first to launch a deep and comprehensive, new-generation free trade agreement i.e., EPA negotiations with the ESA5 whose 2 of its members (Comoros and Madagascar) are LDCs. This deep EPA will likely become the template for all African Caribbean and Pacific-ACP regions.
- **A new mandate that turns the EPAs into Comprehensive Economic and Trade Agreement (CETA):** Respondents pointed out that the deep EPA comes as a revision of the 2002 trade mandate and needs to be checked against the original version to see what is new. The new mandate is much more far-reaching than the 2002 version as it incorporates everything that the EU has been pushing in its FTAs since CETA including Investor-State Dispute Settlement (ISDS), digital trade, regulatory disciplines, investment and trade facilitation, far reaching Intellectual Property Rights (IPRs), comprehensive Technical Barriers to Trade (TBTs) and Sanitary and Phytosanitary Standards (SPS) chapters.
- **Likelihood in the erosion of EPA benefits to ESA5:** It was noted by respondents that the EU is of the view that the ESA5 will benefit from the current interim EPA and subsequently the deep EPA, as the ESA5 members are currently exporting more to the EU. While respondents do not dispute this, they noted the possibility of this change given the competition both from African countries and other regions as EPAs are implemented and standards enforced.
- **Low utilization of EPA opportunities by ESA5 Countries:** According to respondents, countries like Zimbabwe's potential to access opportunities presented by EPAs remains constrained by internal challenges, politics, bad environment, currency issues, etc. These factors have also derailed the flow of investments into Zimbabwe from the EU, thus undermining the potential positive contribution of any trade agreement. Many companies and individuals with money in Zimbabwe are currently taking it outside because of the poor environment. This deficit in new investments will affect industrial growth and product diversification essential for exploiting opportunities in trade agreements.
- **Negative implications on small-holder farmers in ESA5:** Respondents expressed concern that the experience of implementing Structural Adjustment Policies under the tutelage of the International Monetary Fund (IMF) and World Bank (WB) shows that premature extensive market opening, like sought in the comprehensive EPA not only leads to the displacement of uncompetitive domestic producers, but it also allows resources to leave the country. Liberalizing local food markets in key agricultural products like dairy and beef, poultry, vegetables in the face of such unequal competition is not a prescription for improving efficiency, but a recipe for the destruction of livelihoods on a massive scale. The imbalances in agriculture, for example, pity farmers (including peasants) in ESA5 against

those from the EU, who on average receive a hundred times more in agricultural support. ESA5 farmers' ability to sell on the local market can be undercut by rapid trade liberalization that opens the way to surges of cheap imports.

- **Potential implications on TRIPS Flexibilities:** Respondents noted that the ongoing comprehensive EPA negotiations could have a profound impact on areas of health and health services in the ESA5 Economies. Respondents were concerned that the provisions for intellectual property rights, in which the Cotonou Partnership Agreement (CPA) intention and ESA commitment to protect trade-related intellectual property rights (TRIPS) flexibilities to ensure access to medicines and medical technologies is evident, but not yet articulated in the draft EPA. The experience of other EU free trade agreements (FTAs) suggest that ESA countries and their parliaments and civil societies need to vigilantly ensure that the draft text put forward by ESA5 in this area is affected in the comprehensive EPA, viz to provide for full TRIPS flexibilities and capacity support for their implementation. This is more important especially during COVID-19 and the already position by the EU at the WTO refusing to grant TRIPS flexibilities on the COVID-19 vaccine. ESA5 countries are urged to make no commitments in any health or health-related services beyond what is already committed at WTO.
- **Limited understanding of the technical issues being negotiated under comprehensive EPA:** In Zimbabwe, it was noted that ZimTrade, Confederation of Zimbabwe Industries (CZI) and Competition and Tariff Commission (CTC) are the current organisations attending negotiation meetings as called by the Government. There is however lack of understanding of the technical issues involved in the negotiations, not only by the industry but also the line ministries, As the industry is not participating in the negotiations, it becomes very difficult for them to appreciate, understand and benefit from the final agreements. Some of our companies will know of the benefits when they are exporting products right at the border, so there is no awareness on the agreements. Coordination of important stakeholders has been a big challenge, including coordination of the line ministries, industry and CSOs.
- CSOs greatest hope about the comprehensive EPA

Reminiscing about the interim EPA and its implications on ESA5 economies and highlighting the state of play and process of the ongoing negotiations for a comprehensive EPA, CSOs stressed a number of issues they hope will be addressed in the comprehensive EPA. These are highlighted below:

- **Primacy of appropriate EPA implementation strategies:** To fully benefit from the interim EPA, and subsequently the deep EPA there is a need for appropriate implementation strategies to improve access and diversify exports to EU individual member states. CSOs also hope for the development of a common methodology aimed at finalizing a monitoring and evaluation framework for the interim EPA and subsequently the deep EPA. This will act as a springboard to defining a joint understanding of the progress and remaining challenges to ESA5 implementation of the interim EPA to be able to adequately address them.
- **Comprehensive EPA as a tool for socio-economic development:** The desire for the CSOs is for EPA to be trade tools that generate socio-economic development through the reduction of poverty, reducing social and economic inequalities, enhancement of the standards of living and people's quality of life. CSOs envision trade and investment to promote justice and prosperity for holistic salvation. In this regard, the participation of Non-State Actors in trade agreements and monitoring the impact of trade initiatives are vital in ensuring socio-economic development and advocating for the delivery of benefits across all stakeholders, particularly the most vulnerable groups.
- **Increased involvement by Non-State Actors in the comprehensive EPA negotiations:** Respondents pointed out that currently, there is little involvement and participation of the industry and other non-state actors in monitoring the implementation of the current EPA and influencing the ongoing negotiations is very weak. CSOs are not engaged in the negotiations and no organisation has been evaluating the implementation of the National Indicative Programme. It is also no wonder that there

was no single Civil Society Organisation from the ESA5 group that registered to participate in the recently concluded EPA Civil Society Dialogue on the negotiations to deepen the EU-ESA5 EPA. It is therefore hoped by CSOs that there will be the establishment of an Independent Mechanism to Monitor the Trade and Investment Agreements between the EU and ESA5. Through such a mechanism, independent research, awareness-raising and multi-stakeholder policy dialogues should be convened to influence the trade relations with the EU and link advocacy at the national level with regional and continental initiatives.

2. PERCEPTIONS FROM GOVERNMENT

a. Role of Government in the EPA Negotiations

Respondents from the different government Ministries, Departments and Agencies indicate their primary mandate is to coordinate and formulate trade negotiating positions in the context of the deepening of the EPA as well as the implementation of the interim EPA. The government MDAs also are charged with undertaking consultations with all relevant stakeholders prior to devising a strategy/position on the EPA negotiations. The relevant ministries of ESA5 also conduct brainstorming and debriefing meetings to apprise relevant stakeholders on the status of implementation of the interim EPA and formulate negotiating positions on the deepening of the EPA. This strategy aims at ensuring inclusiveness and transparency in the EPA negotiations which subsequently is vital for ownership of the implementation process.

The relevant International Trade Divisions of the ESA5 formulate all positions in consultation with the Private Sector and Civil Society which is most of the time part of their respective delegations. Whereas the involvement of the private sector, is not accepted by the EU, ESA5 Countries continue to maintain that the Private sector institutions should be part of the delegation negotiating the EPA, as they are the key beneficiaries to the agreement.

b. Impacts (positive and negative) of the existing interim EPA in ESA5 Countries

The interview gathered the views of government respondents on the implications of the interim EPA on ESA5 economies. Regarding positive impacts, according to the Mauritius Government, the comprehensive EPA has been a game-changer for Mauritius by practically addressing challenges faced by the country in its economic development policies. For example, it has resulted into an expansion in the coverage of products, enjoying duty-free access on the EU as well as improved the RoO for products of export interest such as Tuna and Garment.

The grant of 10 million euros provided by the EU for the establishment of an E-Licensing platform has played a major role in improving Mauritius ranking in the Ease of Doing Business. Exports of tuna to the EU have also increased as a result of relaxation of RoO, in particular, the derogation had a positive impact on our tuna exports to the EU. According to Zimbabwe, exports from Zimbabwe to the EU have been increasing. For instance, Zimbabwe exports to the EU such as Tanganda tea, avocados and peas have increased by 12% for the period 2012-2019. The country is also currently having a trade surplus with the EU, thus comprehensive EPA offers more opportunities for Zimbabwe.

Another positive impact registered by the government of Zimbabwe has been increased support by the EU to boost the country's export potential and capacities. The EU launched the Zimbabwe European Partnership Agreement Support programme (ZEPA) of 10 million EUR (over 11 million USD) with interventions to assist the country with the implementation. The support programme has facilitated improvements in policy, legislative and regulatory frameworks as well as developing the capacity of trade institutions to manage trade policy and trade agreements; improved trade facilitation by reducing the cost and time of trading across borders; and enhanced the competitiveness and export capacity of Micro, Small & Medium Enterprises (MSMEs) in selected value chains.

In general, it was observed that there has been a strong national uptake among the ESA5 in EU trade because of the EPA, as the EU remains the main exporter partner for the ESA5. Indeed, this primacy is seen from the increased commitment by EAS5 to implement their EPA market access schedules, with countries like Mauritius preparing to effect the last tariff phase down in December 2022.

While a number of remarkable achievements have been registered under the interim EPA, a number of challenges have also been documented. For example, the interim EPA has resulted into a continuous drop in Mauritius exports to the EU as from the implementation of the interim EPA to date, with Exports falling from USD 1.4 billion in 2008 to USD 865 million in 2019. This, according to the Mauritius government shows that the interim EPA is not enough to meet the growing challenges. Mauritius and Madagascar also explain concern over the constant decline in their exports of garments and sugar (for Mauritius) which are intrinsically related to either EU unilateral policies (such as the GSP schemes) or EU FTAs concluded with 3rd countries which have taken our share in the EU's market.

The ESA relevant ministries to trade have also noted lack of support to firms in meeting EU standards, inadequate framework in particular for agro based products, high concentration on few products and inability to diversify to new markets. It was also noted that project-based assistance, as is the current mode can be complex and difficult to implement.

All the four countries have noted that there as yet to be major diversification both in terms of products with the interim EPA, which is a matter of concern. Thus, the exploration of a comprehensive EPA is thought to be an opportunity on product diversification in other areas like services.

c. Main obstacles for ESA5 to trade under the EPA

In a bid to understand the positive implications of interim EPA to ESA5, the interviewer teased out the major obstacles for ESA5 to trade under the EPA. These include:

- High compliance difficulties in particular in meeting EU Standards and SPS measures. For instance, the REACH regulation has become extremely costly for SMEs. On the other hand, Private standards also constitute an additional barrier to the private sector and SMEs in ESA5 to access the EU market.
- Lack of promotion activities in EU non-traditional markets, with an increasing tendency, is to focus on traditional markets like France, Spain, Germany, Netherlands and Belgium. While there is potential in other markets like Poland, Croatia and Bulgaria, focus by ESA5 remains low.
- The EU Market is becoming more and more competitive and difficult to access for Small Island Developing Countries like Mauritius and Seychelles.
- High cost of production as compared to Asian countries due to economies of scale labour, and logistics etc.
- Stringent RoO preventing local stakeholders to source from the most efficient and accessible regions such as South Africa or low-cost suppliers.
- Limited trading under EPA has also been due to challenges to ESA5 in implementing all tariff commitments under the interim EPA. This is because there are provisions under the interim EPA, in particular, the development Chapter which the EU should implement in consultation with ESA5.

d. Difficulties in application of RoO

Whereas it was noted that the respective ESA5 have no major difficulties to apply the RoO at national level, sometimes rules are subject to different interpretation. Moreover, the RoO themselves are too stringent for key products of export interest to ESA5 in particular for fish and fish products. The quantum of the automatic derogation is too low, while the derogation rules are difficult to apply. For countries like Mauritius, cumulation with South Africa and other competitive sourcing destinations is too rigid under the EPA.

Some additional concerns raised by the Mauritius and Seychelles Customs are as follows:

- The verification of proof of origin at import can be burdensome due to lack of awareness of Exporters on the issuance of invoice declaration where there is no clear indication of originating products, incorrect origin declaration wording on the invoices.
- The application of value/weight tolerance, Annex VII are not indicated in invoice declaration as the same are not prescribed in the Agreement. Customs need to rely on MAA in cases of control required.
- Lack of transparency of registered products for REX registered Exporters. The EU website provides an indicative list of registered products. Customs need to rely on MAA to check for authenticity of proof of origin.

Concerning dissemination of information on RoO, it was observed that the ESA5 majorly use The EU's Official Journal or website; custom and websites of respective government/public, public-private, private) Trading community associations. Nevertheless, it was also pointed out that there is a lot of scope for improvement and increasing awareness of RoO through increased capacity building of Chambers of Commerce and exporters associations.

- i. Use of cumulation: ESA5 countries like Mauritius and Seychelles noted that they are using Bilateral Cumulation and are unable to use the Diagonal cumulation due to stringent requirements such as the conclusion of the Administrative Customs Cooperation Agreement. The box below shows a number of products (HS heading) for which cumulation is cumulation most commonly used.

Table 26: Use of cumulation

HS Heading (2 digit)	
Product Description	HS 1604 -Prepared or preserved fish HS 0905 -Vanilla pods; HS 9503 -Reduced-sized models and similar recreational models

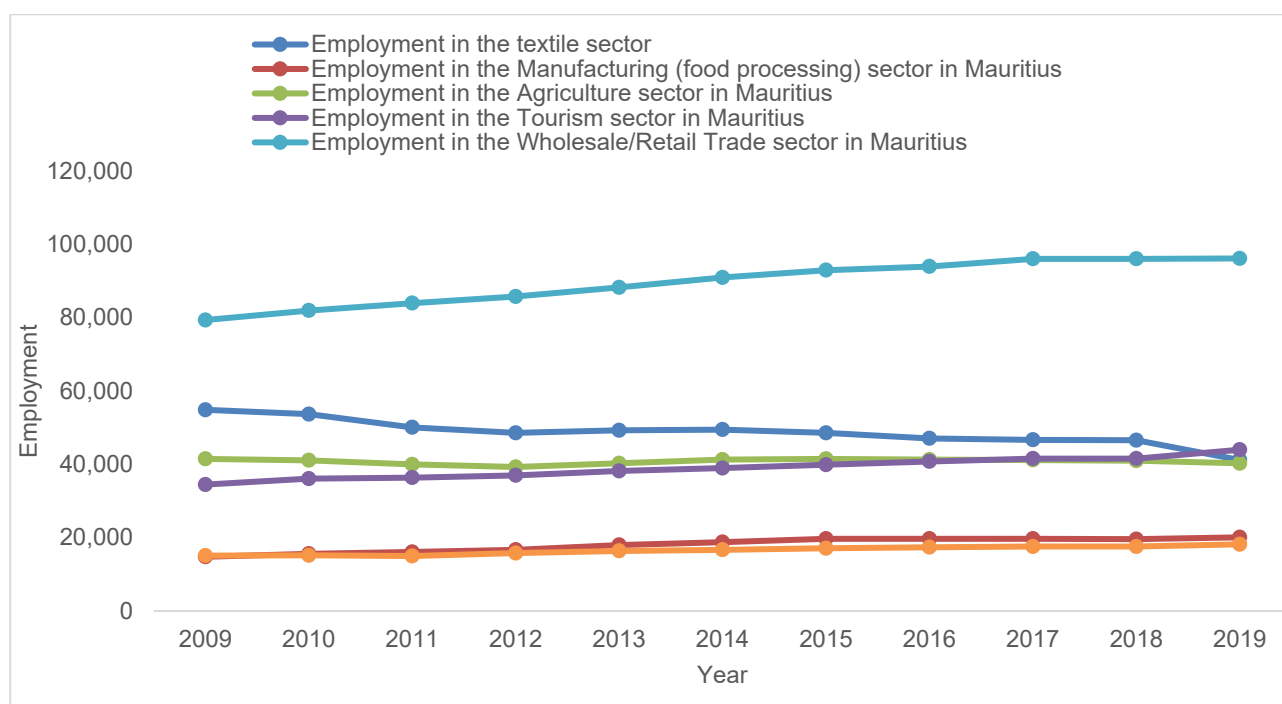
Mauritius, Seychelles and Madagascar also noted that the rules for cumulation are too stringent under the interim EPA. This is because the two of the main conditions are that: the RoO should be similar and there should be an Administrative Customs Cooperation Agreement in place. Such conditions are extremely challenging to operators. It is therefore a widely accepted proposal that the EPA should allow a flexible mechanism for cooperation on customs matters. It is also proposed that the RoO need to be improved to meet current challenges to ESA5 in trading with the EU. For instance, there are several products under Annex XII of the RoO Protocol (products excluded from cumulation with South Africa) which are now duty-free, but ESA cannot cumulate on such products. Furthermore, the RoO are so stringent that the local canneries depend heavily on EU operators (vessels) for the raw tuna. The new Agreement should also consider flexible RoO provided for instance under the EBA scheme or other FTAs on specific products of interest to ESA5.

e. Impact of interim EPA on trade and investment in ESA5.

Interviews with officials from the Ministries responsible for Trade in Mauritius, Madagascar, Zimbabwe and Seychelles revealed that the interim EPA has ensured that the preferences under past arrangements are maintained. Consequently, the interim EPA assisted in securing Jobs and preventing companies from closing down in 2008. It was reiterated that failure to implement the interim EPA by the ESA5 would have led to loss of preferences on the EU market.

However, it was also a widely shared view that compared to the previous Arrangements (i.e. LOME, COTONOU), the interim EPA has not delivered on its objective. This is attributed to diversification remaining low, with ESA5 exports still concentrated on few products such as Sugar, Tuna, tea, coffee and Garments. Thus, there hasn't been a major "economic leap" as forecasted in 2008 with the signing of the interim EPA. Exports are on a declining trend. In contrast, exports from the EU have increased substantially on the ESA5 Market. The impact of the interim EPA on employment in ESA5 has not been systematically investigated. Nevertheless, for Mauritius, the various sectoral employment trends have evolved since 2009. The figure below gives a general indication of the evolution in employment in six industrial sectors, namely: textile, food manufacturing, agriculture, tourism, retail and wholesale and ICT.

Figure 17: Change in employment per sector



Source: HRDC.

f. Non-EPA factors responsible for change on ESA5 trade flows

In a bid to increase trade flows apart from the EPA, the ESA5 has undertaken a number of initiatives including:

- Adoption of an Africa Strategy which had a positive impact on our trade flows;
- Implementation of the Business Facilitation (Miscellaneous Provisions) Act 2017 aimed at streamlining business procedures such as eliminating duplication of procedures, eliminating of several permits and licences.
- Implementation of an online system for export permits-All applications for import and export permit are made electronically through Trade links and portals.

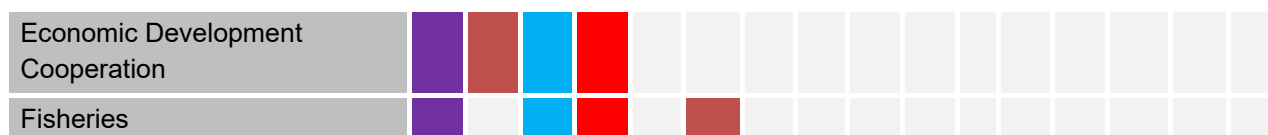
- Introduction of a statutory time frame for authorised officers of regulatory agencies to issue a permit;
- The setting up of a Coordinated Border Management Unit to improve efficiency in the delivery of services at ESA5 Customs points.
- Establishment of the National Single Windows by the respective Customs to expedite and simplify information flows between businesses and public sector agencies.

g. Key issues in the negotiations for the comprehensive EPA

According to the directorate of Trade in Mauritius, all the issues as agreed under the Scoping Paper in particular Trade in services, Investment and RoO should be atop the agenda of the comprehensive EPA. Whereas this same position is shared by the Ministry of Trade in Zimbabwe, more importantly, the Government of Zimbabwe is negotiating widening and deepening of interim EPA as they are of the view that addressing issues of trade facilitation, trade in services and SPS will help Zimbabwe to unlock value in the current interim EPA. It was also pointed out that comprehensive EPA negotiations with the EU are strategic in view of the continuing political dialogue between the EU and Zimbabwe. Other identified key issues for consideration include Trade and Sustainable Development (TSD) chapter, including agricultural safeguards. The table below shows the choices of the ESA5 in preferences of issues of focus in the comprehensive EPA negotiations.

Table 27: Key issues in the negotiations

	High priority				Low priority				No need to be negotiated				I don't know			
	M	ZM	S	MD	M	ZM	S	MD	M	ZM	S	MD	M	ZM	S	MD
RoO																
Customs and trade facilitation																
Sanitary and phytosanitary measures (SPS)																
Technical Barriers to Trade (TBT)																
Trade defence mechanisms																
Trade in Services																
Investment liberalisation and investment facilitation (and private sector development)																
Public procurement																
Intellectual Property Rights (IPR)																
Competition																
Trade and Sustainable Development (TSD)																
Agriculture																
Dispute avoidance and settlement;																
Institutional Structure																



Source: Own compilation

Note: M=Mauritius; Z= Zimbabwe; S= Seychelles & MD= Madagascar.

h. Need for development dimension in the comprehensive EPA

Majority of the respondents from both Civil Society, Government and Private Sector noted that in negotiations at the World Trade Organisation (WTO) as well as in regional and bilateral trade negotiations like the EPA, ESA5 countries have sought developmental agreements with non-reciprocal arrangements because of the asymmetries in world trade, their lack of economic power in relation to their developed counterparts and their serious poverty challenges. It is therefore vital that all the Comprehensive EPA negotiations prioritize the development dimension of trade. According to them, the success and failure of Comprehensive EPA negotiations has to be measured not mainly against market access of interest to ESA5, and removal of trade distortions in an asymmetrical manner, rather it has to be measured against the ability of the EU, a major trading partner, to commit herself on development.

Need for an explicit Development cooperation chapter: It was argued by respondents that the comprehensive EPA should consist of Negotiations on aid and development need to be linked to a costing of measures and to the costs of compensating people for the losses encountered as a result of implementing the provisions of the EPA. It is important that the comprehensive EPA includes predictable funding of an EPA adjustment facility.

i. ESA5 greatest hope about the comprehensive EPA

A number of government technocrats and politicians expressed a lot of hope in the comprehensive EPA. While a number of issues are cross-cutting e.g. increased assured market access for the private sector, a number of “nationalistic” tendencies were observed on key asks by the different countries of the comprehensive EPA.

Expectations from Mauritius Government:

According to the Mauritius Government, the comprehensive EPA can be a game-changer for Mauritius and practically address challenges faced by the country in its economic development policies. For instance, the Comprehensive EPA can play a crucial role in developing new sectors such as Robotics, Artificial Intelligence, Research, the Pharmaceutical sector etc. It can also enhance the value chain through flexible RoO.

The government of Mauritius also maintains the stand that comprehensive EPA negotiations will strengthen the interim EPA if issues related to Technical Barriers to Trade (TBTs), RoO and Sanitary and Phytosanitary Measures (SPS) are finalized. There are 13 issues currently being negotiated including transparency in government procurement, trade in services, TBT, agriculture, trade competition. Further improving on these issues will strengthen opportunities in the EPA, hence Mauritius is leading negotiations on trade-related issues. Thus, whereas the negotiations are not yet in full swing and given the negotiations that have taken place, Mauritius, like other ESA5 has no concerns. In the context of the full EPA, the government hopes that specific provisions should be incorporated to support Smaller Companies and SMEs to export to the EU.

Expectations from the Government of Zimbabwe

There is a general view from the government that Zimbabwe will not lose anything by participating in the ongoing negotiations. While the government acknowledges that Zimbabwe faced challenges in implementing the interim EPA during the early stages, the country has liberalised most of its trade and is now on course to liberalise 80% of its trade by 2022. Thus, Zimbabwe is participating in the negotiations to widen EPAs and is

leading negotiations on trade-related issues. Nevertheless, the major challenge and greatest fears are on the possible impacts of tariff liberalization on Zimbabwe's revenue envelope. However, the government maintains that since liberalization has already been done under the interim EPAs, the ongoing negotiations will not have a huge bearing on our industry. Moreover, the deep EPAs are now on course of negotiations, thus there is a need for the country to see how they will be implemented and evaluate impacts over time.

It is perceived that all ESA5 countries will benefit if RoO are improved e.g., cumulation with South Africa will benefit Zimbabwe, Seychelles and Madagascar to boost their capacity to meet the quality and quantity requirements in the EU market.

In implementing the interim EPA, Zimbabwe was very slow as it faced several 'internal' challenges, that it took her 3 years to produce the 1st liberalization schedule, and another 3 years to issue the 2nd schedule. However, Zimbabwe is now on course as the country has produced the full liberalization schedule and discussions are now focused on widening and deepening the current EPAs through the new negotiations.

Furthermore, from the government's perspective, exports from Zimbabwe to the EU have been increasing. For instance, Zimbabwe exports to the EU have increased by 12% for the period 2012-2018. The country is also currently having a trade surplus with the EU, thus comprehensive EPA offers more opportunities for Zimbabwe. However, with the implementation of EPAs, and due to the BREXIT effect, these trade dynamics are likely to change as Zimbabwe will face more competition from other African as well as non-African countries. Thus, while Zimbabwe's exports such as Tanganda tea, avocados and peas are currently benefiting from EPAs they will face more competition in the long run. It is therefore important that under the comprehensive EPA, efforts for the EPA to support the country in upgrading and diversifying its exports for strategic positioning are critical.

Given the dynamic needs of the weaker trading parties, the EU launched the Zimbabwe European Partnership Agreement Support programme (ZEPA) of 10 million EUR (over 11 million USD) with interventions to assist the country with the implementation. The support programme aims at Facilitating improvements in policy, legislative and regulatory frameworks as well as developing the capacity of trade institutions to manage trade policy and trade agreements; Improving trade facilitation by reducing the cost and time of trading across borders; and enhancing the competitiveness and export capacity of Micro, Small & Medium Enterprises (MSMEs) in selected value chains. It is hoped that under the comprehensive EPA, this special support will be maintained. Indeed, to date, support has been provided to upgrade laboratories in Zimbabwe to improve on health standards of exports, with other resources directed towards helping the National Economic Consultative Forum (NECF) to conduct dialogues on EPAs at different platforms. At the dawn of comprehensive EPA negotiations, bolstering support for an EPA awareness campaign in Zimbabwe but other ESA countries is paramount.

Competing interests among ESA5 Countries: The Zimbabwe government stressed that under the current comprehensive EPA negotiations, the five countries are expressing different interests. For example, Mauritius has a complete set of products and is moving fast as it is seeing opportunities in key areas like services and investment, whereas Zimbabwe has to focus on Agricultural products like horticulture but need to sort out standards and certification issues. It is therefore expected that comprehensive EPA negotiations are conducted on issues/content rather than deadlines while ensuring that all negotiating parties are on board.

Expectations from the Government of Seychelles

Lack of clarity on Development Finance aka EPA Fund: The Ministry of Trade raised concern about the Development finance not coming as anticipated, as it is mostly being provided in the form of technical assistance, thus, there being no meaningful development finance being provided by the EU under the interim EPA. This concern, unless negotiated under the comprehensive EPA is likely to persist. The government, therefore, hopes for a commitment of the EPA Fund, instead of the hypothesis that the funds will accrue from the increased ESA5 Trade with the EU under the comprehensive EPA.

Limited efforts to strengthening key EPA trade facilitating institutions: The division of Customs takes note of the fact that the work on strengthening of key trade institutions such as Competition and Tariff Commission is yet to commence, since this would be supported under the development support. Whereas there are some funds supporting EPA implementation, including micro, small and medium enterprises as well as laboratory development, there is need for targeted support to key divisions of public sector that will facilitate the expediting of trade under EPA. The respondents also note that at the request of the ESA5 countries, the EU has agreed to provide financial assistance for the setting up of an EPA Coordination Mechanism whose aim is to provide appropriate coordination and technical support to the five ESA countries so that they can engage effectively in the negotiation process.

Need to put regional (ESA5) integration at the core of EPA negotiations: The government of Seychelles makes an important observation that whereas the interim EPAs, to some extent, caused disintegration among ESA5 members, it is strategic for ESA5 countries to continue negotiating. This is because it is important to consolidate intra-ESA5 trade and integration which requires harmonized positions on negotiating Free Trade Agreements (comprehensive EPA) with third parties like the EU.

The Seychelles government is also of the belief that that the comprehensive EPA will provide duty-free quota-free access to ESA5 countries to the EU market based on favourable RoO. Accordingly, it is expected that the EPA will support export diversification, competitiveness, increased export standards and promote the creation of local and regional value chains among ESA5 economies. However, the Seychelles government is also aware of the fact that the comprehensive EPA will provide for reciprocal trade which will have varied impacts on industry, employment and poverty as well as food security issues among ESA5 Countries. Thus, it is hoped that adaptation mechanisms that are critical will be provided under the EPAs as a number of (sensitive) products will likely be excluded from the agreement.

The comprehensive EPA opens competition for the European markets within the other ACP countries and from non-ACP member countries. To benefit in the long run, Seychelles and other ESA5 countries have to diversify their production and upgrade their standards as they will face intense competition from other regions. In the future, many aspects of trade including the standards and SPS issues will have to be adhered to, thus support under the EPA to upgrading these aspects is critical.

Revision of current policy on Dock dues: The Seychelles and Mauritius reiterated their concern on the application of dock dues levied by the French Overseas Territories having an impact on products from ESA5. The ESA5 hope that the EU won't extend the dock dues (Octroi de Mer) after December 2020.

3. GENERAL CONCERNS OF THE PRIVATE SECTOR AND SMEs

In general, documented concerns by respondents from the Private Sector and SMEs in Zimbabwe, Seychelles, Mauritius and Madagascar vary but are not limited to:

- **Limited preparedness of private sector in utilizing Market Access offer under comprehensive EPA:** Private sector and SMEs are concerned that, 1) capacity of the industry is very weak (27% capacity utilization in 2019) primary products and commodities are currently being exported to the EU, and 3) EU development support is not advancing value chain development, as it is currently concentrated towards micro and smallholder primary production, and 4) domestic service providers are generally weak and will

be decimated by foreign multi-nationals. However, the private sector and SME actors feel that there are limited options to trade with the EU outside the EPA as other preferences may be challenged within the WTO. In Zimbabwe, it was pointed out that the comprehensive EPA negotiations are occurring at a time when the industry in Zimbabwe is operating below capacity as highlighted in the manufacturing sector survey of 2019 that industry capacity utilization fell by 11.8% to 36.4% in 2019 from 48.2% in 2018.

- According to a number of private sector organisations, there is however lack of understanding of the technical issues involved in the negotiations, not only by the industry but also the line ministries. This is because majority of sector players are not participating in the negotiations, which makes it very difficult for them to appreciate, understand and benefit from the final agreements. One hope the private actors hold is that the companies only know of the EPA benefits when they are exporting products right at the border, so there is no awareness on the agreements.
- **Delay from ESA5 Governments making EPA lose meaning:** Respondents from the Private Sector and SMEs indicated that there has been no meaningful impact from the interim EPA as the government delayed implementing the agreement provisions due to a lot of structural challenges. Concerning the current negotiations, the industry is of the opinion that there is not much that is going to happen in terms of benefiting because Zimbabwean industries are still struggling to take off. In 2020, Confederation of Zimbabwe Industries (CZI) projected that capacity utilisation for the industries will fall to 27%. Thus, the industry in Zimbabwe is not strategically positioned to take any opportunities in the European market.
- **EU Assistance not well targeted:** Both Private sector respondents from Zimbabwe and Madagascar indicated that most development assistance coming from the EU is targeted especially towards micro and smallholder production level with no significant impact into the European market. Such development and trade finance has no capacity to transform the Zimbabwean and Madagascar industry; rather it will cement them as producers of primary commodities for export to the EU market, thus the relations do not promote national and regional value chain development. Indeed, despite countries like Zimbabwe currently having a trade surplus with the EU, exports from Zimbabwe to the EU markets are dominated by primary commodities at the expense of manufactured products. Nevertheless, it is important that the comprehensive EPA negotiations address issues of SPS since ESA5 exporters consider the EU Market Standards strict.
- **Less likelihood to benefit from trade in services:** Respondents also revealed that to a larger extent, the comprehensive EPA is likely to bolster opportunities in areas such as tourism, health, education and transport in ESA5 Countries. However, while trade in services is a major thrust in the comprehensive EPA, Private sector and SME respondents from Zimbabwe, Seychelles and Madagascar still raised concern over the limited capacity to benefit from trade in services. While the governments advance the notion that they have a growing service industry with potential to improve the efficiency of other sectors (agriculture, mining and manufacturing), the service sector is dominated by foreign supply and most of local service providers cannot compete with Europe. For instance, providers of private education, banking, insurance and health in these countries cannot compete with similar providers from Europe. It is therefore proposed that policy space is preserved by ESA5 in negotiations of services under the comprehensive EPA to enable them grow their competitiveness.
- **Continue with the EPA Negotiations on Goods and Development Linked to Benchmarks and based on African Union (AU) Position:** Respondents hold a general position on the importance of continuing the EPA negotiations with the EU. However, one key issue that stands out is that liberalization commitments should be pegged to clear development thresholds or benchmarks and must not be more onerous than the low levels of liberalization by other countries (e.g. Mexico and Syria) in EU FTAs. Only when these benchmarks have been attained should countries liberalize a certain percentage of their trade with the EU. The EPA negotiations should also take into account the common positions on the various contentious issues articulated in the AU template. For example, various clauses in the EPA which the EU has inserted should be eliminated: standstill clause; export taxes; MFN clause, non-execution clause and

abolition of community levies as these are clearly WTO-plus and would put Africa's development objectives in serious jeopardy. Also, other clauses must be brought into line with the WTO, such as the article on quantitative restrictions and the EU's commitment at the WTO to eliminate export subsidies by 2013 and to substantially reduce domestic supports in agriculture. Other clauses must be vastly improved upon: bilateral safeguards; infant industry clause; modification of tariffs; definition of the parties, to name only a few.

- **Proposed EPA negotiation between UK and ESA5 and its implications on the comprehensive EPA negotiations:** It was pointed out that in line with the Trade Bill 2017-19, the UK Government is in the process of delivering continuity in the UK's trade relationship with the ESA countries of Madagascar, Mauritius, Seychelles and Zimbabwe. In the proposed text, there are provisions like bilateral safeguards (especially the "trigger price mechanism" on sugar), RoO and dispute settlement which are likely to circumscribe the likely positions in the EU-ESA5 comprehensive EPA Negotiations. The EU-ESA5 comprehensive EPA should therefore consider provisions of negotiating FTAs with third parties by ESA5.

a. Specific concerns by the Chamber of Commerce-Zimbabwe

The respondents from the Confederation of Zimbabwe Industries (CZI) are of the view that negotiations for a widening EPAs are taking place at a time when the industry in Zimbabwe is operating below capacity as highlighted in the manufacturing sector survey of 2019 that industry capacity utilization fell by 11.8% to 36.4% in 2019 from 48.2% in 2018. The industry is of the view that there has been no meaningful impact from EPAs as the government delayed implementing the agreement provisions due to a lot of structural challenges. Concerning the current negotiations, the industry is of the opinion that there is not much that is going to happen in terms of benefiting because Zimbabwean industries are still struggling to take off. In 2020, Confederation of Zimbabwe Industries (CZI) projected that capacity utilisation for the industries will fall to 27%. Thus, the industry in Zimbabwe is not strategically positioned to take any opportunities in the European market.

The industry is further concerned that most development assistance coming from the EU is targeted especially towards micro and smallholder production level with no significant impact into the European market. Such development and trade finance has no capacity to transform the Zimbabwean industry; rather it will cement Zimbabwe as a producer of primary commodities for the EU market. Moreso, greater proportion of development finance is channeled towards consultancy work which is provided largely supplied from Europe.

Despite Zimbabwe currently having a trade surplus with the EU, exports from Zimbabwe to the EU markets are dominated by primary commodities at the expense of manufactured products. One of the reasons being that, for manufactured products, the EU is strict on standards which most of Zimbabwean industries find difficult to attain. Moreso, if Zimbabwe is competitive on manufactured products, it will close out products from the EU.

Exports to the EU have been dominated by horticultural products that include paprika, macadamia nuts, avocados and peas. There have been some efforts to resuscitate beef and meat production for purposes of supplying the European market. More so, the industry is concerned that pertaining to value chain development, the current Zimbabwe-EU trade relations cement Zimbabwe's position as a producer of primary commodities, thus the relations do not promote national and regional value chain development.

4. GENERAL RECOMMENDATIONS

- The comprehensive EPA negotiations need for appropriate implementation strategies by ESA5 respectively to improve access and diversify their exports to EU individual member states.
- There is a need to undertake further steps towards the development of a common methodology aimed at finalizing a monitoring and evaluation framework for the interim EPA, as this is an important step to define a joint understanding of the progress and remaining challenges as to be able to address those adequately.

- On negotiations process, it is critical to have non-state actors play a critical role in monitoring EPAs as they have a potential to negatively affect industrial growth, employment, poverty reduction and industrial transformation. Social partners, including the Church and CSOs, have to monitor implementation of EPAs through continuous engagements with other stakeholders. The monitoring exercise has to entail systematic collection of data and experiences and processing these experiences to inform policies and negotiations.

5. OTHER ISSUES OF CONCERN

IP Negotiations in the EU-ESA5 Negotiations: Chapter V on areas for future negotiation under the interim EPA references Article 3 for the scope and coverage of future negotiations. The provisions commit the signatories to continue negotiations on IPRs with a view to “concluding a full and comprehensive EPA” which covers a list of subject matters that include intellectual property. Interviews revealed that the interim EPA has provisions on future IPR negotiations. However, participants, especially CSOs and the Private sector noted that the inclusion of intellectual property in the EU-ESA5 EPAs was not necessary to comply with the WTO rules on preferential treatment for goods from ESA5 countries. The EU’s insistence on the inclusion of IPRs continues to place undue pressure on ESA5 countries to negotiate IPR provisions at a time when discussions on IP are ongoing at the WTO and AfCFTA. However, it was appreciated that it does not commit ESA5 to any kinds of obligations, leaving room for “cooperation-based” provisions or “best endeavour” clauses, rather than substantive obligations.

Nevertheless, it was documented that the inclusion of the so-called “TRIPS-plus” Intellectual Property (IP) provisions in bilateral agreements between the EU and developing countries have become an issue of increasing concern. The European Commission has explicitly included a “TRIPS-Plus” mandate in its trade goals, stating that, “The EU should seek to strengthen IPR (Intellectual Property Rights) provisions in future bilateral agreements....¹⁰²” This policy shift is intended to revisit EU’s approach to the IPR chapters of bilateral agreements, including the clarification and strengthening of the enforcement clauses. This new approach by the EU alters the entire landscape of international Intellectual Property by short-circuiting developing country attempts to ensure full consideration of development-appropriate standards in multilateral agreements at the World Trade Organization (WTO), the World Intellectual Property Organization (WIPO).

6. GLOBAL DEVELOPMENTS

Respondents noted that the EU-ESA5 deep EPA negotiations should examine the EPAs efficacy and relevancy in the context of global developments which are taking place. These include, inter alia, the backlash against globalisation, BREXIT (and its implications to EU Market Value), the increasing inequality between and within countries largely as a result of the unfair trade arrangements, a relapse to protectionism, the recognition of the need for industrialization/structural transformation and the redefinition of the role of the state in ensuring inclusive growth. These developments clearly indicate the urgent need to harness our resources through promoting cross sectoral synergies. This will require policy space to rethink and redesign our development strategy in light of these emerging challenges.

Liberalisation of Investment: Respondents, both CSOs, Private Sector and Chamber of Commerce from Madagascar, Seychelles and Zimbabwe stressed that under the EU-ESA EPA negotiations, the EU has proposed negotiations on investment liberalisation, as a means to increase FDI, form part of the comprehensive EPA. It was argued that this is a means to introduce the agenda of the Marshall Plan for Africa and Global Compact with Africa in the EPA negotiations. Respondents noted that the EU has been a *demandeur* of binding rules on investment at the multilateral level. It has pursued this position in a number of fora including the WTO; in bilateral negotiations on FTAs, in the EPAs, and the various Bilateral Investment Treaties. Over the past decades, EU member states have signed over 1200 Bilateral Investment Treaties

¹⁰² European Commission “Global Europe: competing in the world” EC Policy Review, October 4, 2006

(BITs). It was argued that ESA5 states should consider their position not only in terms of costs and benefits of their market access commitments in sectors covered by an EPA but also in terms of their post-establishment commitments under other investment treaties. They may find it useful to link EPA negotiations to the renegotiation or clarified interpretation of existing bilateral investment treaties with European states.

Need to develop and update national EPA implementation strategies: All the respondents from the public and private sector, including Civil Society noted the need for ESA5 Countries to develop and update their respective EPA implementation strategies and frameworks. This is especially given the context of the need to mobilize resources domestically for financing the implementation and mobilizing the private sector to utilize the existing market and broader markets to be negotiated under the deep EPA.

Key Findings: Comoros

1. PUBLIC SECTOR

Knowledge of the EPAs

- Strong knowledge, key departments are part of the negotiating team.
- Negotiating team from an APE group with sectoral input from eg INRAPE, customs. The private sector is represented by the Chamber of Commerce and the Economics Faculty at the University.
- EU pays for two participants, one based in Brussels and one coming from Comoros. The government can't afford to finance other places so the country is always under-represented in negotiations.
- EU still the biggest trading partner with over half of imports coming from the EU.
- The EPA negotiations are linked to others involving the EU notably post-Cotonou and the continental free trade area.
- In the beginning, the EU asked not to integrate fishing agreements but is happening within the new round.

Concerns

- Comoros is one of the least attractive countries for investment in Africa so how will the country benefit from these agreements?
- Need to introduce VAT to replace customs duties, but there is fear around this switch. A study financed by the IMF is underway and it could be done in three years – it's possible, but politicians are worried they don't have the capacity to collect taxes internally rather than at the frontier.
- The government was worried about COMESA but has worked out well, and more impact as more trade.
 - Complex for customs, can't manage between the different regimes for different trading blocs and agreements. There is only one customs agent who is properly trained and the right equipment and software is not in place. The two ports in Anjouan and Grande Comore also brings complexity. Customs needs support from the EU to manage the different tariffs.
- Problem of theory versus reality, with the heavy difference incapacity to adapt between EU and Comoros.
- Also, the negotiators will change role frequently within the civil service, so lose the expertise.
- Comoros can gain economic benefits but must have the capacity to profit, haven't benefited from preferential access so far.
- Risk of imported products being in competition with locally produced.

- Key that public procurement laws and rules are adopted as part of the agreements so that the correct procedures are followed, which is not happening in the main.

Priorities for negotiations

- Fisheries and agriculture including processing cash crops in-country for export are the two key sectors. Increasing exports in line with the plan d'emergence of the government will lead to increased employment. Another priority is tourism.
- Local production must be prioritised and safeguarded.
- Need support to be able to respect the norms of EU markets otherwise won't be able to benefit from the opportunities (e.g. testing laboratory); otherwise risk that custom receipts go down without benefits so negative impact.
- Progressive application is a positive and must be maintained.
- Need to improve capacity to apply preferential rates at customs and apply RoO.
- Support is needed to increase exports e.g. installation of laboratories for testing as per EU norms.
- Comoros could ask for more support from the EU to improve their negotiating expertise.

2. PRIVATE SECTOR

Knowledge of the EPAs

- Weak understanding in general – would like to have more information and be able to study the texts. Don't understand what opportunities there are because the information is not available.
- Public sector doesn't seem to know a lot either; civil society nothing at all – only once to their knowledge has civil society been involved in these discussions.
- Government doesn't fully understand agreements it has signed and then ignores clauses not related to the public sector when it comes to implementation so e.g. business can't profit from reduced import taxes.
- Since 2007, accords have become an affair of a few civil servants at the ministry; other actors have been gently moved aside.
- Notices that in other countries the private sector operators accompany the Ministry to meetings and negotiations, not the case in the Comoros.
- In meetings private sector is always in the minority, contradictory views aren't welcome.

Trade issues

- The three major bottlenecks for imports are taxes, logistical problems and transport costs.
- Three major bottlenecks for export: export taxes, technical barriers, transport costs plus admin formalities and financing for trade.
- Goods are imported from the EU for quality reasons, otherwise importers source from elsewhere.

Concerns

- Suggests that as soon as speak about EU only a few operators are targeted for invitations – should invite other sectors like export crops. People should be invited because they have an interest not just inviting people for inviting people.

- Concerned about the capacity of the Comoros to negotiate faced with the EU teams, don't position ourselves well so UE tends to come out the winner (e.g. fisheries).
- Negotiations must be equal – requires Comoros' negotiators and economic operators going up a level, EU could support in this.
- Need to better negotiate based on the needs of our companies, need to reinforce capacity through training and developing an institute capable of delivering this training (e.g. negotiations unit at the chamber).
- Negotiators should be fixed positions not changing with political regimes; needs a department in charge of negotiations with a fixed team.
- Doesn't feel that the private sector is properly represented at the moment, need a mechanism to better mobilise the inputs and views of the sector.
- Customs should be able to manage the complexities of the different import tax regimes.
- The potential for reduction in import taxes worries the government given the dependency of the state on import taxes, needs to be replaced with VAT.
- Problem of EU phytosanitary rules and the lab in the Comoros not being accredited so e.g. cash crops have to get tested in Réunion which is not possible for all exporters – a centre for testing and transformation at the airport would help.
- Fisheries accords discussed as part of APE (this confusion was generalised across several interviewees), they are seen as very unequal without monitoring.
- Comoros is a small and disorganized market with a lack of outlets – how will they profit from the agreement?
- Given the Comoros rating, no investors will come to the country.
- Will local businesses benefit through partnerships and easier export, or will there be more competition? What can local businesses benefit from these agreements?
- Will there be employment creation or will things reinforce the wealth of import-exporters.
- At the moment the EU is happy to import unprocessed materials but if Comoros looks to export processed goods it will become complicated.
- At import, people don't understand RoO to apply the appropriate rate, but customs should have the capacity to do this.
- No phytosanitary rules in Comoros but very high to export to EU so difficult for products to be competitive.

Priorities for negotiations

- Three priorities for negotiations: fisheries agreements (including a regional fishing monitoring centre); non-tax blockages to exportation; a mechanism for evaluating the impact of the agreement.
- EU should ensure access to information, ensure there are private sector representatives in the negotiations, that reports etc are published online.
- Want to focus on the agricultural sector and services to export. A focus on technological services could also be important.
- Needs to be equality in the negotiations; there is a pretence that the negotiations are inclusive when they aren't. Ideas against the mainstream are avoided and ignored. There should be one set of interactions with the government and one with the private sector. Make the negotiations clear, clean and inclusive. Only once this is achieved is it worth giving an opinion on priorities for the accords and for investment.

- Fisheries agreements completely unequal, this should be a priority within the current negotiations.
- A second priority should be to support producers to improve production capacity.
- VAT should replace import taxes and the agreement.

3. CIVIL SOCIETY

Knowledge of the EPAs

- None of the civil society actors had ever heard of the EPAs; the fishery agreements were mentioned by a couple as the only EU-Comoros agreements that they were aware of.
- Some actors felt that the government did not make the effort they should do to inform and involve civil society in negotiations and that more transparency was important.

Concerns

- Poorer people at the bottom of agricultural value chains would be unlikely to benefit from the agreements unless targeted measures were included within the agreements. Similarly, poorer people would not be using the EU products that would potentially benefit from reduced import taxes under the agreement.
- The Comorian market is disorganized and weak, and local producers and sellers would not be able to compete with imports.
- Environmentally, given the lack of waste management systems in Comoros, there was concern that increasing imports, particularly foodstuffs, could lead to increased rubbish.
- Questions were raised about the potential for reduced import taxes to have significant impacts on the country given the treasury's high level of dependency on these.

Priorities for negotiations

- The priority focal area proposed by several actors was the agriculture sector, including increasing production and developing industries to support processing and export.
- Questions were also raised about the fisheries agreements, which are seen as unbalanced, and whether these could be integrated into negotiations.
- The potential to involve opening market access to Mayotte was also raised.

4. GENERAL FINDINGS

- **Only civil servants directly involved in negotiations have a high understanding of the EPA:** other public sectors interviewees had limited knowledge, the private sector said, in general, they had very weak knowledge, and civil society respondents had none. Non-state actors suggested that there was not a lot of sharing of information.
- **The private sector would like to be more involved in negotiations:** several businesses representatives felt that the sector was largely excluded from the processes and negotiations to the detriment of Comoros negotiating power and potential to benefit from the agreements.
- **Interviewees from all sectors expressed concern about unequal negotiating capacity:** 'Comoros brings a general practitioner to the table whilst the EU has a full suite of medical specialists' best sums up the widely-held view that Comoros is unable to compete with the EU at the negotiating table. Non-state actors suggested that in addition, the Comorian authorities did not maximise their capabilities by failing to be inclusive regarding their negotiating teams.

- **Fisheries and agricultural export were the two sectors most frequently prioritised for negotiation:** the existing fisheries agreements were widely described as unequal with Comoros seen as gaining little benefit compared to the EU, hence a need for these to be renegotiated as a priority. Support to agricultural production, processing and export was also seen as key whilst ensuring that value went down the chain to the poorest people.
- **The reduction of revenues from customs taxes is seen as a key potential impact, with a possible upside:** A high percentage of Comoros' treasury receipts comes from taxes on imports, so a potential reduction in these was a concern to several interviewees. Others however suggested that the agreements could serve to progressively push taxation away from imports towards other forms such as Value Added Tax (VAT), which would be an important fiscal step for the country.
- **Several interviewees highlighted the potential for opening up trade with Mayotte:** some interviewees expressed frustration that whilst Mayotte is off the negotiating table, normalising trade with Mayotte, particularly agricultural export, could have more of an impact and help more of the poorest people than other elements of the EPA.

Online questionnaire

After mapping EU and MS stakeholders, due to their extensive number, the team distributed a short survey (less than 10 minutes to complete), where it invited stakeholders to self-identify their interest in the negotiations and a discussion with us. We circulated the survey twice with a deadline of 1 December and an extension to 10 December. The survey will remain open throughout the duration of the projects, but the specific deadlines allow us to consolidate findings for each report submission. The online questionnaire can be located here (in English and French): https://lse.eu.qualtrics.com/jfe/form/SV_db76MEAHQHNVYUd.

The survey was circulated to 295 stakeholders but response rates remained low despite the specific actions taken.

Respondents

We received 19 survey responses via Qualtrics and three responses by email via our dedicated mailbox. Out of these responses, the composition was the following:

- **The majority of respondents were business associations.** Ten business association, one company, four non-governmental organisations/civil society, one social partner and one self-defined as other responded to the survey.
- **The majority of respondents (seven responses) identifies as belonging to the Agricultural and Food and Drink Industry;** two – Aeronautics industries; two – Tourism; two – Electrical and electronic engineering industries; two – International development; one – chemical distribution; one – Maritime industries; one – Automotive industry and one in Textiles, fashion and creative industries.
- **The headquarters of respondents varied across the EU and ESA5,** across Belgium (2), Bulgaria (1), Denmark (1), France (4), Germany (2), Italy (2), Mauritius (2), Slovenia (1), and Sweden (1).
- Among the respondents, seven organisations chose to remain anonymous and ten opted for their organisations' comments to be made public. Based on that, we note a few of the responses below.

Key findings across the survey questions

1. **What advantages and positive developments have you seen under the interim EPA between the EU and the ESA5?**
 - An EU respondent noted that the main development is the improvement in trade patterns with some of the ESA5 countries

- An ESA5 respondent highlighted that they have continued benefiting from duty-free and quota-free access for sugars, hence assuring the sustainability of supplies.
- DAFC (Danish Agriculture & Food Council) noted a slight increase in exports from Denmark.
- BDI – Federation of German Industries included the following benefits:
 - The BDI considers the EPAs as facilitators for investment and trade of German companies with the ESA countries.
 - Most African nations are currently still too small to offer an attractive market for German companies. The EPAs promote free trade within African regions and with the EU they increase the attractiveness of African markets for European and German companies and thus create incentives to create urgently needed jobs on the African continent.
 - Thus, the BDI advocates a fast ratification of the EPAs. These create WTO-compatible and long-term access to markets for African exporters and European companies.
- FECC:
 - An even level playing field is paramount for improving the EU's resilience and for building the model of an open strategic autonomy. The EU expects high-quality products from its local manufacturers, regardless of whether this refers to the single market or for export to third countries.
 - FECC supports the EU proposal on identifying, preventing and eliminating technical barriers to facilitate trade in goods between the two regions. Article 10.5 ([link](#)) of the EU note states that although harmonizing standards between regions should be implemented whenever possible, taking into account the climatic, geographical and/or technological factors is also needed as this may pose as a challenge for some of the African stakeholders and regulators. By identifying the bureaucratic and technological barriers, trade between the EU and ESA5 through the proposed interim agreement could further be optimised.
 - Lastly, another positive impact of the EPA is the decrease in import prices due to the continued trade liberalisation. Consumers from both the EU and ESA5 would be subject to wider choices for both products and services under the agreement.

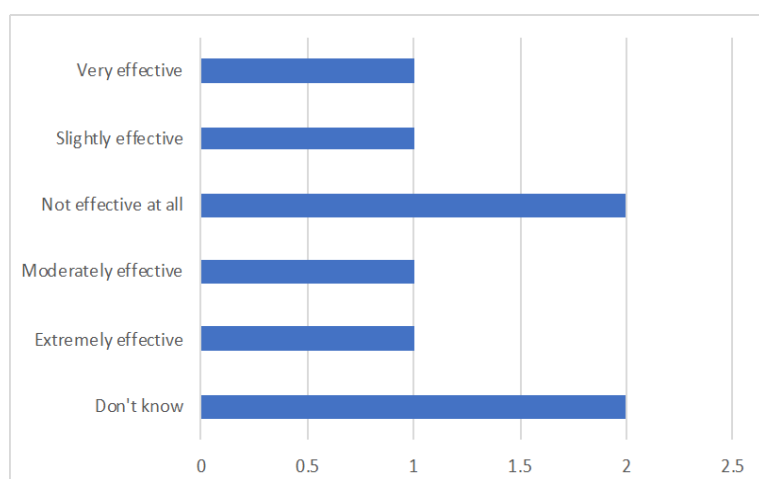
2. What problems and obstacles are you aware of under the interim EPA between the EU and ESA5?

- An EU respondent noted that no substantial problems exist as far as their business in the Textiles industry is concerned.
- An ESA5 respondent highlighted that "preferential market access is being eroded by the free trade agreement finalised by the EU with non-ACP sugar producers, namely from Central and Latin America, and Asia. Insufficient flexibility under certain clauses such as the 'value tolerance rule' under RoO."
- DAFC (Danish Agriculture & Food Council) noted little awareness and attention about the existence of the EPA.
- Syndicat du Sucre de la Reunion:
- "Globally, the EU sugar sector does not consider that ESA country's market holds significant growth potential for exports of sugar from the EU. This situation concerns white sugar but also the ready-to-use brown sugars (called speciality sugars), which are produced in the EU outermost regions (La Reunion, Guadeloupe, and Martinique). The EU speciality sugars market is a very small niche market of only 250 000 to 300 000 tonnes, which only represents 1.5 % of the total EU sugar market. As some ESA countries already produce speciality sugars and due to

economies of scale, producers of speciality sugars originating in the EU outermost regions will never be able to compete on equal terms with ESA producers on their market. Whereas reciprocity in trade relations was one of the main objectives of the Cotonou Agreement, the Interim Agreement created access inequities by giving to ESA sugars full duty-free and quota-free access to the EU continental market, while keeping most of the ESA market closed to EU sugars.”

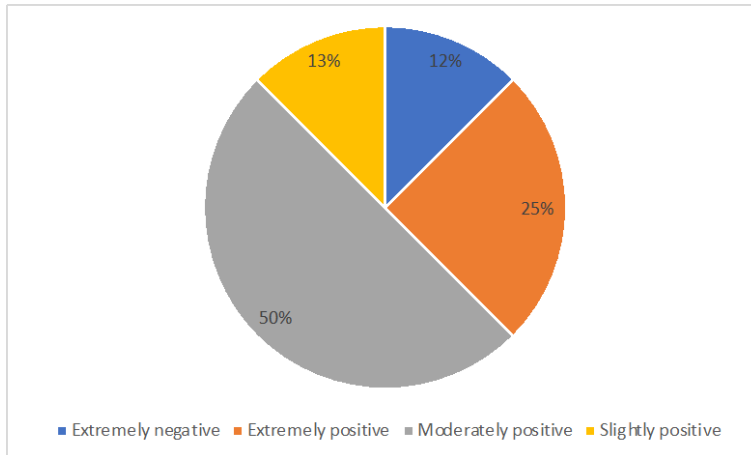
- BDI notes:
 - I) Negative effects on sensitive product groups of individual African countries: The BDI recommends that the EU shows flexibility regarding the time frame and product scope of EPAs. So-called sensitive product groups should be examined for the individual African countries. A case-by-case decision as to which product groups should be excluded from EPAs for the time being for individual African countries is needed.
 - II) Lost customs revenues for the five African countries: The BDI advocates that the EU provides adjustment assistance for lost customs revenues. This should include programmes to increase the competitiveness of the African private sector and infrastructure measures.
- FECC:
 - The planned impact assessments in 2021 should consider the short, medium and long-term effects of the EPA. An analysis of the socio-economical effects of its implementation should be considered not just between the ESA5 member state, but also within the region of a specific country. Through a region-specific assessment, the EPA evaluation would facilitate identifying whether economic activity could also be stimulated in underperforming regions of the ESA5.
 - Additionally, as with all other partnership agreements, confirming the EPA without the corresponding implementation would result in an uneven level playing field for both the EU and African stakeholders. Regulators should ensure that businesses taking part in the scheme comply with the proper requirements for importing and exporting.

Figure 18: How would you assess the effectiveness of the agreement for the issues that are relevant to you?



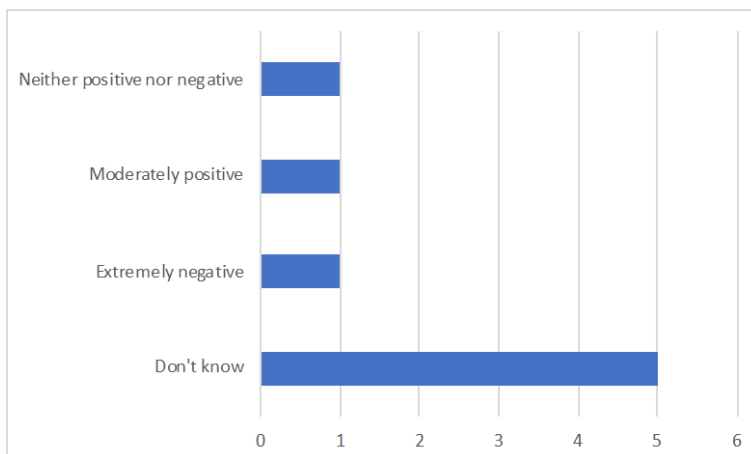
Source: Qualtrics survey data

Figure 19: How would you rate some of the economic impacts of the existing interim EPA in your sector/in the overall economy?



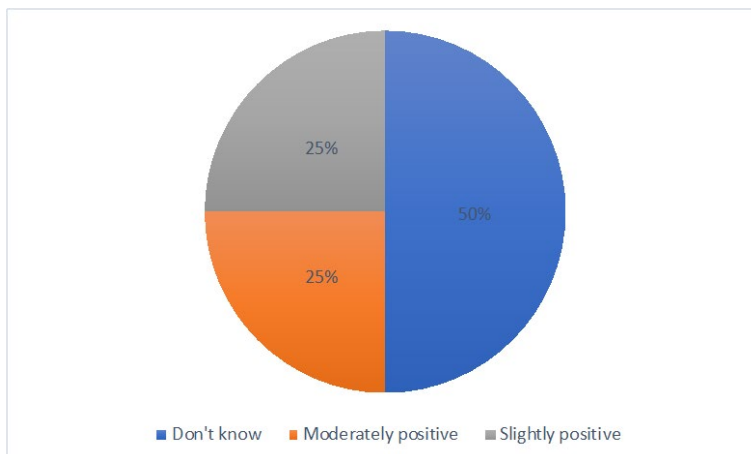
Source: Qualtrics survey data

Figure 20: How would you rate some of the environmental impacts of the existing interim EPA in your sector/in the overall economy?



Source: Qualtrics survey data

Figure 21: How would you assess some of the social and human rights effects of the existing interim EPA agreement between the EU and ESA5 in your sector/in the overall economy?



Source: Qualtrics survey data

3. Please elaborate briefly on your response on any type of impact above?

- DAFC (Danish Agriculture & Food Council): "Increase in trade flows would generate increased production, profits, commercial relationships, diversification of income sources, wider product range of high-quality products."
- Syndicat du Sucre de la Reunion:
 - "Since both the EU outermost regions and the EU trade partners are located in tropical regions, they produce the same types of agricultural products, unlike EU continental producers. The cane-sugar sector of La Réunion is the leader on the segment of speciality sugars, which only accounts for 1,5 % of the EU sugar market. But EU outermost regions products are in direct competition with ESA States products. As ESA States do not comply with the EU high social, environmental and regulatory standards, producers from the EU outermost regions will never be able to compete on an equal footing with the ESA producers. The reform of the CMO, combined with the total opening of the EU market to sugars originating in the ESA States, led the latter to redirect their production towards the manufacturing of speciality sugars. The objective is to conquer a segment of the EU market where competition is already intense, due to the entrance of new Latin American stakeholders in 2013. Mauritius has just closed in 2020 one of the last two refineries of the country, stating that it will now focus on speciality sugars production. Deprived from the outlets for their white and raw sugars, the ESA sugar industries are attacking the speciality sugars market. They are destabilising the market of speciality sugars, thus threatening the cane-sugar sector of the EU outermost regions, for whose the EU market is a vital outlet and where it is the leader.
 - The EU white sugar market is no more attractive for the ESA States. Thus, they are increasing their speciality sugars production and exports to the EU, which damages the EU outermost regions."
- A Mauritian stakeholder reported that, the fact that the EU sugar market remains protected from the world market through high tariffs of EUR 419 / ton, it is somewhat protected from the global price volatility. The social and environmental standards on the other hand safeguard the market from unfair competition.
- Olof Palme International Center "Since it calls for adherence to international labour laws and ILO conventions, it is a good incentive for partners. It also debunks the alternate narrative on punitive sanctions."

4. What are priority issues that need to be addressed in the deepening negotiations, from the perspective of your sector/field of expertise?

- DAFC (Danish Agriculture & Food Council): Trade facilitation, TBTs/NBTs, services, digital trade.
- ECSA:
 - From the perspective of ECSA (representing the European shipping industry), it is important that maritime transport services form part of any trade-related discussion the EU has with third parties, including in this case economic partnership arrangements. This is because shipping transports around 90% of the global trade in goods, making it the backbone of world trade. In Africa, the role of shipping is even more important due, in some cases, to less advanced land transport. Efficient maritime transport is therefore critical to the region's trade and economic growth, but shipping and ports in this region sometimes lag global trends and standards resulting in high trading costs.
 - Looking at the African continent more broadly, European shipping companies have traditionally held a strong position. They are important partners to African governments and business and ensure they are connected to the world and intra-African trade. They are heavily

investing in the continent and support local employment. Africa is also one of the main growth markets for EU businesses, with an anticipated doubling in size of the population by 2050.

- However, at the same time, EU shipowners are more and more confronted with market access barriers (in Africa but also around the world) targeting foreign logistics and maritime services. These include i.e. cargo reservations or preferences for national carriers, licensing requirements or rules on vessel flag, crew or construction to carry cargo or call at ports in their territory, all to the detriment of foreign operators.
- For ECSA, partnership agreements offer an excellent platform for the EU to draw the attention of its trading partners to the importance of free access to maritime services as well as safe and secure frameworks for operation. We, therefore, encourage the EU to seek to include maritime services in future EPAs or revisions of existing EPAs.
- Syndicat du Sucre de la Reunion:
 - "The first priority is to extend, under the current EPA, the period during which the local market of the French overseas departments is protected from ESA sugar exports, as provided by the provision currently in force, and under the EPA to come, replicating the provision currently in force which protects the local market of the French overseas departments from ESA sugar exports.
 - If applicable to the EU outermost regions, the general suppression of custom duties as provided by the EPAs would offer a disproportionate competitive advantage to products originating in countries where social, environmental and productive standards are way lower than the EU ones. It would deny the sugar industry of the EU outermost regions an access to their local market.
 - Under the Cotonou agreement, this safeguard has been replicated in every EPAs and interim agreements, which have been concluded. The interim Agreement between the EU and the ESA States thus acknowledged the necessity to protect the local market of the French overseas departments from sugar imports originating in the ESA States. The EU-ESA EPA thus provides that duties remain due on sugar originating in the ESA States and released for free circulation in the French overseas departments (on tariff lines of chapter 1701 of the combined nomenclature). This provision is applicable for a period of 10 years, which is extended for a further period of 10 years unless the EU and the ESA States agree otherwise.
 - Since the EU-ESA EPA came into force on May the 14th 2012, the first deadline will be on May the 14th 2022, with a potential extension until May the 14th 2032. Hence the necessity to extend, under the current EPA, the period during which the local market of the French overseas departments is protected from ESA sugar exports, as provided by the provision currently in force, and under the EPA to come, replicating the provision currently in force which protects the local market of the French overseas departments from ESA sugar exports.
 - The second priority is to define an annual duty-free quota on speciality sugars imports from ESA states to continental Europe, and maintain imports duties on volumes, which would enter the EU market in excess of the annual duty-free quota conceded to ESA states. The tariff lines of speciality sugars are lines 1701 1390, 1701 1490, 1701 9100 and 1701 9990 of the combined nomenclature.
 - Since the reform of the CMO, the market environment has changed: the EU must take notice of the metamorphosis of its own sugar market – a metamorphosis that the EU encouraged itself – and take all needed measures to protect its territories and industries. In the framework of the negotiations on the deepening of the EPA with the ESA States, the principles and terms, which previously led to the complete opening of the EU market, must not be maintained.
 - For the record, the EU speciality sugars market is saturated, as more than 60% of its shares are detained by non-EU competitors. It is now imperative and urgent to define a market

exposure volume, i.e. a maximum volume of concessions that can be granted to speciality sugars originating in foreign countries, by considering the quantities that are currently imported. This will minimize the windfall effect and secure the stability of the EU speciality sugars market.

- This rule is all the more needed and legitimate, as the French overseas departments still can increase their production of speciality sugars and to supply more than 45% of the EU market. This objective will not be met if the EU keeps maintaining duty-free and quota-free access to its speciality sugars market.
- A Mauritian stakeholder reported the need for more flexibility concerning RoO, namely cumulation with other ACP producers and the value tolerance rule.
- FECC:
 - FECC calls for an enhanced monitoring effort when it comes to EU requirements under the EU Africa strategy. Without comprehensive surveillance of products being exported to Africa, this may result in (1) the undermining of EU and African producers and service providers, (2) the decrease of the EU market share and (3) unnecessary regulatory roadblocks due to internal bureaucratic delays. Rue du Luxembourg 16b, 1000 Brussels, Belgium T: +32 2 679 02 60| F: +32 2 672 73 55 www.fecc.org
 - The EU and other national governments are currently offering various regulatory and financial incentives for green initiatives, particularly for public stakeholders and start-ups. These include so-called emissions allowances under the EU Emissions Trading System (EU ETS) scheme. With both the EU Green Deal and the EU African Strategy being game-changers, support from the community must include a wider part of the industry to ensure that this type of initiatives on integrating circular economy on trade also includes socio-economic benefits. We believe that such incentivization is a more pragmatic approach that encourages companies to innovate, rather than the overlapping regulations in the European chemical wholesale sector that result in an uneven level playing field, most especially for SMEs.

5. What obstacles and challenges to doing business, trading or investing in your sector/ the overall economy would you like to see addressed in the ongoing negotiations?

- DAFC (Danish Agriculture & Food Council): Administrative costs associated with cumbersome export procedures.
- An Italian stakeholder: "Stabilisation politique, sociale et economique. Amelioration des systèmes bancaires"
- Syndicat du Sucre de la Reunion:
 - "Even if the ESA States accept to open their market to EU sugars, their social, environmental and productive standards are way lower than the EU ones. There is a clear absence of level playing field between the EU and the ESA States with regards to the cane sugar sector. The sugar industries of the ESA States are thus extremely competitive on their own market, which will therefore remain closed to EU outermost regions products in any case.
 - The EU speciality sugars market was already widely open to non-European countries (over 60%). Yet, in 2013, the EU concluded new trade agreements with Central America and the Andean Community and allowed their cane sugar producers to enter the EU speciality sugars market. Consequently, competition has considerably increased on this market, thus accentuating pressure on the EU outermost regions.
 - The EU must acknowledge that part of its agricultural production is in direct competition with agricultural products produced in neighbouring tropical countries. For this reason, it is

necessary to associate the main economic actors of the outermost regions in every step of the negotiation process.

- A Mauritian stakeholder reported the lack of visibility on the market as it is not sufficiently protected, namely through too many trade agreements covering sugar and even domestic support provided to EU producers (namely VCS).
- ECSA:
 - Trade in services with African countries will undoubtedly thrive in the forthcoming decades, but EU trade policy should step up to seize these opportunities and ensure European businesses, such as the shipping industry, can play their role in ensuring sustainable development, mobility and connectivity – and avoid the aforementioned market access barriers.
 - We highlight that non-discriminatory treatment of maritime transport services has been formally recognised by EU and ACP partners as of 1995 (Lomé IV, art. 126 and following) and reconfirmed in 2000 (Cotonou Agreement, art. 42). EU shipowners stress that also in the renewed Partnership Agreement, as well as any other legal and policy instruments with African partners, these principles must be anchored, even re-enforced. Fair and free competition, without local protectionist measures, are of key importance to secure continued growth. For maritime transport, free access to transport markets should go hand in hand with the right of establishment of local agents to provide the best possible service to our customers. Shipowners' rights to invest in local services and infrastructure should also be secured.
 - By anchoring clear commitments on maritime transport in legally binding instruments, the EU creates the certainty EU businesses need to invest and operate in a sustainable manner. Such trade agreements should at a minimum ensure that third countries provide reciprocal market access to EU operators as third country operators face in the EU and include provisions on maritime transport services to the fullest extent possible, including:
 - Commitments towards unrestricted access to the international maritime markets and trades on a commercial and non-discriminatory basis;
 - Commitments to abolish and abstain from cargo-sharing agreements or reservations;
 - The ability for EU operators to be granted reciprocal national market access, at minimum feeder services, and all forms of transshipment and movement of empty containers;
 - Ability to perform multimodal operations;
 - The ability for EU operators to establish local representations in third countries.
 - These are in addition to all other supporting measures to ensure smooth and fair trade.

Three of the remaining questions have each six valid responses and do not carry information relevant for the ex-post report.¹⁰³

Update to strategy going forward

Over Jan / Feb, the team will take the following steps to increase EU response rates:

¹⁰³ These forward looking questions were: What are the possible economic impacts of the chapters for negotiation in the deepening of the EPA in your sector/ in the overall economy? What are your expectations on the possible environmental impacts of the chapters for negotiation in the deepening of the EPA in your sector/in the overall economy? What are your expectations on the possible social and human rights impacts of the chapters for negotiation in the deepening of the EPA in your sector/in the overall economy?

- Targeted interviews – identify 20-30 key EU wide stakeholders and approach them directly for interviews. These will be mostly associations, NGOs and other social partners. We will also ask for their assistance to raise awareness of the questionnaire.
- Actively approach MS stakeholders from key trading partners for interviews.
- Discuss with EC potential virtual roundtables on the specific SIA reports and case study topics.

Our aim is still to conduct at least 20 interviews across the four largest trading partners—France, Germany, Italy, and Sweden, for which the stakeholders are still being mapped.

The rest of the annex lists the stakeholders contacted in the EU and MS.

Table 28: EU Stakeholders contacted

Name of stakeholder
ACT Alliance Advocacy to the European Union
Active Pharmaceutical Ingredients Committee
AeroSpace and Defence Industries Association of Europe
Agriculture and Horticulture Development Board (AHDB)
Airlines for Europe
Airports Council International Europe
Amnesty International
ASINCA
Association de l'Aviculture, de l'Industrie et du Commerce de Volailles dans les Pays de l'Union Européenne asbl
Association de producteurs de cinéma et de télévision (EUROKINEMA)
Association des Constructeurs Européens d'Automobiles (ACEA)
Association Européenne Du Commerce De Fruits Et Légumes De L'UE - European Fruit and Vegetables Trade Association
Association of European Automotive and Industrial Battery -EUROBAT
Association of European Heating Industry
Association of European manufacturers of sporting ammunition
Bureau International des Producteurs d'Assurances & de Réassurances (BIPAR)
Business and Industry Advisory Committee (BIAC)(OECD)
BUSINESS EUROPE
Câmara de Comércio e Indústria da Madeira
Câmara de Comércio e Indústria da Horta
Câmara de Comércio e Indústria de Ponta Delgada
Câmara do Comércio de Angra do Heroísmo
Carbon Capture & Storage Association (CCSA)
CEFS - Comité Européen des Fabricants de Sucre
Central Europe Energy Partners (CEEP)
Centre de Documentation, de Recherche et d'Information des Peuples Autochtones
Chambers of Commerce of Ireland (Chambers Ireland)
Coalition for Fair Fisheries Agreements
Cobalt Development Institute (CDI)
Comité du commerce des céréales, aliments du bétail, oléagineux, huile d'olive, huiles et graisses et agrofournitures de l'U.E.
Comité Européen des Entreprises Vins
Committee for European Construction Equipment
Committee of the European Sugar Users
Confederatia Sindicala Nationala MERIDIAN (CSN MERIDIAN)
Confederation of European Community Cigarette Manufacturers

Confederation of European Paper Industries
 Confederation of National Associations of Tanners and Dressers of the European Community (COTANCE) Private sector
 Confederation of National Hotel and Restaurant Associations (HOTREC)
 Confederation of Netherlands Industry and Employers (VNO-NCW)
 Confederation of the food and drink industries of the EU (FoodDrinkEurope)
 Confederation of the German Textile and Fashion Industry
 Conférence des Notariats de l'Union Européenne
 Conseil des barreaux de la Communauté Européenne (CCBE)
 Council of European Employers of the Metal, Engineering and Technology - Based Industries (CEEMET)
 Danish Agriculture & Food Council
 DIGITALEUROPE
 Direct Selling Europe AISBL
 Ecommerce Europe
 EU Vegetable Oil and Protein meal Industry
 EUROALLIAGES
 Eurochambres
 EuroCommerce
 EURODOM
 Eurogroup for Animals
 European & International Federation of Natural Stone Industries -EUROROC
 European Accounting Association
 European Accreditation (EA)
 European Aerosol Federation
 European Aggregates Association (UEPG)
 European Apparel and Textile Confederation (EURATEX)
 European Association of Automotive Suppliers (CLEPA)
 European Association of Chemical Distributors (Fecc)
 European Association of Cooperative Banks (EACB)
 European Association of Craft, Small and Medium-Sized Enterprises (UEAPME)
 European Association of Dairy Trade (Eucolait)
 European Association of Fruit and Vegetable Processors (PROFEL)
 European Association of Internet Services Providers (ISPA)
 European Association of Metals Eurometaux
 European Association of Mining Industries, Metal Ores & Industrial Minerals (Euromines)
 European Association of Mutual Guarantee Societies
 European Association of Sugar Traders (ASSUC)
 European Association of the Machine Tool Industries (CECIMO)
 European Association representing the agricultural machinery industry (CEMA)
 European Aviation Clusters Partnership
 European Banking Federation (EBF)
 European Biodiesel Board
 European Branded Clothing Alliance
 European Brands Association
 European Broadcasting Union (EBU)
 European Business Services Round Table
 European Cement Association (CEMBUREAU)
 European Centre for International Political Economy
 European Ceramic Industry Association (Cerame-Unie)
 European Cocoa Association Private sector
 European Committee for Electrotechnical Standardization

European Community Shipowner's Associations
European Competitive Telecommunications Association
European Confederation of Junior Enterprises
European Confederation of Woodworking Industries (CEI-Bois)
European Construction Industry Federation
European Consumer Organisation (BEUC)
European Coordination Committee of the Radiological, Electromedical and Healthcare IT Industry (COCIR)
European Coordination of Independent Producers (CEPI)
European Council for Automotive R&D (EUCAR)
European Council for Motor Trades and Repairs (CECRA)
European Crop Protection Association
European Dairy Association
European Diisocyanate and Polyol Producers Association
European Disposables & Nonwovens Association (EDANA)
European DIY Retail Association
European Ecommerce and Omni-Channel Trade Association
European Electronic Component Manufacturers Association
European Engineering Industries Association (EUnited)
European Environmental Bureau (EEB)
European Expanded Clay Association (EXCA)
European Express Association
European Family Businesses
European Farmers (COPA COGECA)
European Federation for Construction Chemicals
European Federation for Cosmetic Ingredients
European Federation of Engineering Consultancy Associations
European Federation of Food, Agriculture and Tourism Trade Unions- EFFAT
European Federation of Foundation Contractors
European Federation of National Associations of Water and Waste Water Services
European Federation of Pharmaceutical Industries and Associations(EFPIA)
European Federation of Public Service Unions (EPSU)
European Federation of the Footwear industry
European Fish Processors & Traders Association and European Federation of National Organizations of Importers and Exporters of Fish (AIPCE-CEP)
European Franchise Federation
European Furniture Industries Confederation
European Health Industry Business Communications Council(EHIBCC)
European Industrial Gases Association
European Lime Association (EULA)
European Livestock and Meat Trade Union
European Man-made Fibres Association (CIRFS)
European Medical Technology Industry Associations (MedTech Europe)
European Milk Board
European Newspaper Publishers' Association (ENPA)
European Organisation for Security
European Organisation of Tomato Industries (OEIT)
European Panel Federation
European Patent Office
European Plaster and Plasterboard Manufacturers Association (EUROGYPSUM)
European Policy Centre
European Potato Processors' Association

European Potato Trade Association
European Power Tool Association
European Property Federation
European Public and Real Estate Association (EPRA)
European Regions Airline Association (ERA)
European Renewable Ethanol Association – EPURE
European Satellite Operator's Association
European Services Forum
European Services Strategy Unit
European Shippers' Council
European Small Business Alliance
European Steel Technology Platform (ESTEP)
European Sugar Refineries Association
European Technology Platform on Sustainable Mineral Resources(ETP SMR)
European Telecommunications Standards Institute (ETSI)
European Textile Collectivities Association
European Trade Union Confederation – ETUC
European Travel Agents' and Tour Operators' Associations
European Tyre & Rubber Manufacturers' Association (ETRMA)
European Whey Processors Association
Europeche
Fair Trade Advocacy Office
Fédération des Experts Comptables Européens (FEE)
Fédération Internationale de l'Automobile (FIA)
Fédération Internationale du Recyclage
Federation of European Publishers
Federation of European Rice Millers
Federation of European Employers (FedEE)
Federation of the European Sporting Goods Industry
Female Europeans of Medium and Small Enterprises (FEM)
Fern
Fertilizers Europe
Foreign Trade Association – Amfori
Freshfel Europe - the forum for the European fresh fruits and vegetables chain
Friends of the Earth Europe (FoEE)
FRUCOM (European Federation of the trade in dried fruit, edible nuts, processed fruit & vegetables and processed fishery products)
Gelatine Manufacturers of Europe (GME)
Glass Alliance Europe
Global Industrial and Social Progress Research Institute(GISPRI)
Global Witness
Greenpeace
Health Action International (Europe)
Health First Europe
Human Rights Watch
Independent Retail Europe
Industrial Ethanol Association
Industrial Minerals Association – Europe (IMA-Europe)
industriAll European Trade Union (industriAll)
Instituto Cuestiones Agrarias y Medioambientales
Intelligent Transport Systems – Europe (ERTICO)

International Association of Users of Artificial and Synthetic Filament Yarns and of Natural Silk
International Confederation of European Beet Growers
International Confederation of Inspection and Certification Organizations
International Co-operative Alliance
International Federation of Reproduction Rights
International Labour Organisation (ILO)
International Land Coalition
International Network for Sustainable Energy – INFORSE-Europe
International Trade Union Confederation (ITUC)
Lighting Europe
Long-Distance Fisheries Advisory Council
Market Advisory Council
Medicines for Europe
Nanofutures
ORGALIM - European Association for Machinery
Organisation pour un réseau international d'indications Géographiques
Plastics Recyclers Europe
Primary Food Processors
European Flour Milling Association
Starch Europe
European Vegetable Protein Foundation
Société des auteurs et compositeurs dramatiques
Solar Power Europe
spiritsEUROPE Private sector
Trade Union Advisory Committee (of the OECD) (TUAC)
Transport and Environment (European Federation for Transport and Environment)
UNIFE
Wind Europe

Source: Own compilation

Table 29: Member States organisations contacted

French stakeholders

Embassy of France in Antananarivo, Madagascar
Embassy of France in Moroni, Comoros
Embassy of France in Harare, Zimbabwe
Embassy of France in Victoria, Seychelles
Ministry of Overseas France
Direction Générale du Trésor, Service des Affaires Multilatérales et du Développement
Caritas (International)
Man and the Environment France
Impact Madagascar
GRET
Collaboration on International ICT Policy for East and Southern Africa ("CIPESA")
Association for Progressive Communications
French Facility for Global Environment

Italian stakeholders

Assocalzaturifici - Italian Footwear Manufacturers' Association
Association of Italian Textile Machinery Manufacturers
ASSOCIAZIONE CENTRO AIUTI VOLONTARI
Cia - Agricoltori italiani

Civil Society Organisations

Cocis (coordination of non-governmental organizations for international development cooperation)

Confederazione Cooperative Italiane

CONFINDUSTRIA ASSAFRICA & MEDITERRANEO

COOPI - Cooperazione Internazionale, Foundation

COSPE

COSV

FederlegnoArredo - Federazione Italiana delle Industrie del Legno, del Sughero, del Mobile e dell'Arredamento

Fondazione Giacomo Brodolini

Italian committee for food sovereignty (CISA)

Italian committee for the right to water (CICMA)

Italian Development Cooperation Agenc

Italian National Agency for New Technologies, Energy and Sustainable Economic Development (ENEA)

Italian network for responsible tourism (AITR)

Italian Trade Agency

Italian Trade Union Confederation

L'Africa Chiama ONLUS-ONG

Ministry of Economic Development, General Directorate for Trade Policy – Division V

Unioncamere

German stakeholders

Africa Business Network

Afrika-Verein der deutschen Wirtschaft

Association of German Chambers of Industry and Commerce (DIHK)

AUMA – Association of the German Trade Fair Industry

BDI - Federation of German Industries

BGA - Federation of German Wholesale, Foreign Trade and Services

Chambers of Industry and Commerce (IHK)

Consulate of Germany in Port Luis, Mauritius

Consulate of Germany in Victoria, Seychelles

Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ)

Embassy of Germany Harare, Zimbabwe

Embassy of Germany in Madagascar

EZ-Scout

Federal Ministry for Economic Affairs and Energy

Federation of the German Export Trade

German Agribusiness Alliance (GAA)

German Chamber of Commerce Abroad (AHK)

German Federal Ministry for Economic Cooperation and Development

German Foundation for World Population

German Trade Union Confederation (DGB)

OroVerde - Tropical Forest Foundation

SPECTARIS - German Hightech Industry Association

VENRO

Swedish stakeholders

Africa Trade and Invest (ATI)

Diakonia

LO-TCO Secretariat of International Trade Union Development Co-operation

Afrikagrupperna (The Africa Groups)

Brussels Office of the Swedish Trade Unions

Business Sweden
Forum Syd
Global Witness
International Development Cooperation
National Board of Trade, Department for WTO Affairs;
Olof Palme International Center
Sweden Africa Chamber
Swedish African Business Cluster Initiative
Swedish Cooperative Centre - We Effect
Swedish East Africa Chamber of Commerce.
Swedish Enterprise
Swedish International Development Agency (SIDA)
Swedish Foundation for Human Rights
Swedish Society for Nature Conservation, SNF

Source: Own compilation

Annex VI (Chapter 2): Implementation of the interim EPA

ESA EPA Market Access:

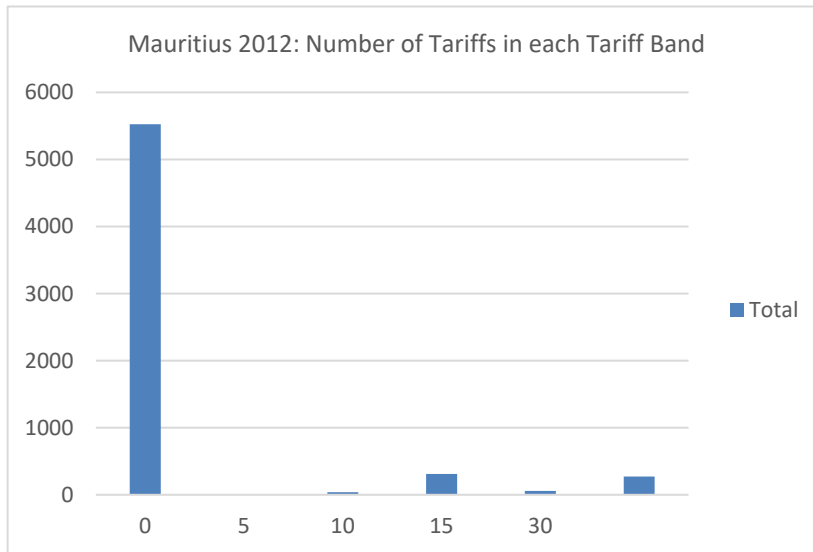
- **Madagascar has a 5-band tariff (0,5,10,20 per cent) and has increased the number of tariffs between 2012, which was the time that Madagascar ratified the interim EPA, and 2019, which is the latest information available.** Forty per cent of these tariff increases were in the highest band and the number of tariffs in all bands were increased, so the weighted average tariff rate increased from 2012 to 2019.
- **Mauritius committed to liberalising 96% of its tariff lines, broken down as raw materials and capital goods by 2014, intermediate goods by 2017 and final goods and sensitive products by 2022.** Raw materials, capital goods and intermediate goods have been liberalised. Even before Mauritius signed the interim EPA, it was virtually duty-free, with a weighted mean average tariff of 1.15 per cent. In 2012, there were 58 tariff lines with a 30 per cent tariff, which was the highest tariff. Commodities in the 30 per cent tariff band included tea (HS chapter 09); packaging (HS chapter 39), suitcases (HS chapter 42); paper (HS chapter 48); electric light bulbs (HS chapter 85); motor vehicle bodies (chapter 87); furniture and vehicle upholstered seats (HS chapter 94); video game consoles; and sanitary towels (chapter 96). In 2019 the number of tariff lines of 30 per cent had risen to 100 but this is mainly because alcohol (HS chapter 22) was added to the highest tariff band. Even with this increase in the number of tariff lines attracting a 30 per cent tariff, the weighted mean average in 2019 was 1.04 per cent.
- **Seychelles has given a tariff offer that involves liberalising all products with a minimal 2 per cent of exclusions.** Seychelles enacted the Customs Management Act 2014 to manage all imports and exports and under the Act, passed statutory instrument no 81 of 2016 entitled the Customs Management (Interim EPA) Regulations, 2016 in December 2016 that went into force in January 2017.
- **Zimbabwe has excluded 20 per cent of its tariff lines from liberalisation and scheduled the remaining 80 per cent as raw materials and capital goods that were to be liberalised by 2014,** after a 5-year preparatory period. Intermediate and final goods have been scheduled to be liberalised in 2022 over 9 years after a 6-year preparatory period. The total period of tariff reduction was, therefore, 15 years. However, implementation of reduced tariffs by Zimbabwe on EU imports started in 2016 after the enactment of Statutory Instrument No. 117 of 2016 entitled Customs and Excise (Economic Community) and ESA EPA) (Suspension) (Market Access Offer) Regulations, 2016 through Government Gazette No. 62 of 7 October 2016.

Table 30: Products Excluded from Tariff Liberalisation Schedules by ESA Country

Country	Main Exclusions from Liberalisation
Comoros	Meat, milk, vegetables, flour, tobacco, motor vehicles
Madagascar	Meat, milk and cheese, fisheries, vegetables, cereals, oils and fats, edible preparations, sugar, cocoa, beverages, tobacco, chemicals, plastic and paper articles, textiles, metal articles, furniture
Mauritius	Live animals and meat, edible products of animal origin, fats, edible preparations and beverages, chemicals, plastics and rubber articles of leather and fur skins, iron & steel and consumer electronic goods
Seychelles	Meat, fisheries, beverages, tobacco, leather articles, glass and ceramics products and vehicles
Zimbabwe	Products of animal origin, cereals, beverages paper, plastics and rubber, textiles and clothing, footwear, glass and ceramics, consumer electronic and vehicles

Source: http://www.eeas.europa.eu/archives/delegations/zimbabwe/documents/eu_zimbabwe/epas_esa_en.pdf

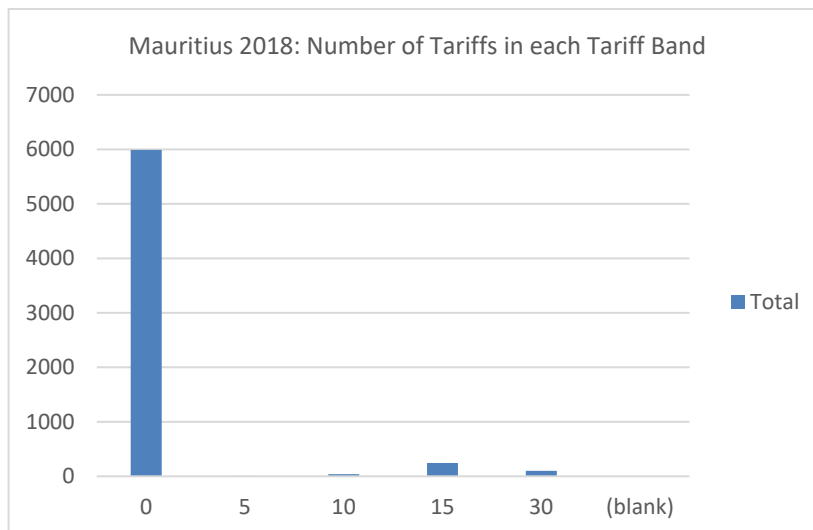
Table 31: Mauritius 2012: Number of Tariffs in each Tariff Band



Source: Comstat

Tariff Rate (Percentage)	Number of Tariffs
0	5,524
5	6
10	38
15	310
30	58
Blank records	272
Total	6,208
Weighted Average = 1.15%	
Source: Comstat	

Table 32: Mauritius 2019: Number of Tariffs in each Tariff Band



Source: Comstat

Tariff Rate (Percentage)	Number of Tariffs
0	5,991
5	6
10	38
15	245
30	100
Blank records	1
Total	6,381
Source: Comstat	

Annex VII (Chapter 3): RoO

Box 1: RoO - Information Sources

The most comprehensive and authoritative source of information on RoO is the Official Journal of the EU, volume 63 (L93 of 27th March 2020). This is replicated on various national websites and portals in the ESA5 countries, both on government and private sector websites such as on the Mauritius Chamber of Commerce and the Mauritius Revenue Authority websites. In relation to the dissemination of information on RoO, survey results suggest that the ESA5 stakeholders use the EU's Official Journal or website; national Customs; and websites of respective government, chambers of commerce, and trading community associations. The survey results suggest that there is scope for increasing awareness on RoO through increasing the capacity of Chambers of Commerce and exporter associations.

Preference Utilisation by ESA Countries into the EU

Appendix 1: Value of ESA EPA Preference Utilisation – Exports from ESA into the EU - 2018

Values	Madagascar	Mauritius	Seychelles	Zimbabwe
Value of utilised preferences	1,147,022,200	797,862,600	324,101,000	239,070,800
Value of non-utilised preferences	341,900	427,100	10,001,600	9,810,900
Total EPA Eligible Exports	1,147,364,100	798,289,700	334,102,600	248,881,700
Preference Utilisation Rates	99.97%	99.95%	97.01%	96.06%

Source: Authors calculations from EuroStat data

Appendix 2: Preference Utilisation of Madagascar's Exports into the EU

EPA Preference Utilization of Madagascar's Exports to the EU, 2018								
HS2	Product Description		Imports (USD thousands)				EPA UR (%)	
		Total Value	Dutiable	EPA Eligible	Entering under			Undefined
					EPA	GSP/LDC		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
09	Coffee, tea, mate and spices	449,943.40	435,804.00	435,804.00	418,816.70	6,155.60	-	96%
62	Articles of apparel and clothing accessories, not knitted or crocheted	238,864.90	238,864.90	238,864.90	160,457.50	6,042.00	-	67%
61	Articles of apparel and clothing accessories, knitted or crocheted	188,112.20	188,112.20	188,112.20	171,805.10	10,609.70	-	91%
03	Fish and crustaceans, molluscs and other aquatic invertebrates	116,381.90	116,243.00	116,243.00	115,937.80	213.50	-	100%
81	Other base metals; cermets; articles thereof	103,336.00	-	-	-	-	-	
75	Nickel and articles thereof	57,694.40	-	-	-	-	-	
33	Essential oils and resinoids; perfumery, cosmetic or toilet preparations	29,046.80	2,269.20	2,269.20	1,719.60	493.80	-	76%
71	Natural or cultured pearls, precious or semi-	21,068.30	1,301.70	1,301.70	1,216.00	19.00	-	93%

EPA Preference Utilization of Madagascar's Exports to the EU, 2018								
HS2	Product Description		Imports (USD thousands)					EPA UR (%)
		Total Value	Dutiable	EPA Eligible	Entering under		Undefined	
					EPA	GSP/LDC		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
	precious stones, precious metals, metals clad with precious metal, and articles thereof; imitation jewellery; coin							
08	Edible fruit and nuts; peel of citrus fruits or melons	40,580.80	1,617.20	1,617.20	1,612.50	-	-	100%
13	Lacs; gums, resins and other vegetable saps and extracts	39,021.00	38,793.40	38,793.40	38,728.70	-	-	100%

Source: Authors calculations from EuroStat data

Appendix 3: Preference Utilisation of Mauritius's Exports into the EU

EPA Preference Utilization of Mauritius' Exports to the EU, 2018								
HS2	Product Description		Imports (USD thousands)					EPA UR (%)
		Total Value	Dutiable	EPA Eligible	Entering under		Undefined	
					EPA	GSP/LDC		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
16	Preparations of meat, fish or crustaceans, molluscs or other aquatic invertebrates	293,325.50	293,325.50	293,325.50	293,321.60	0	0	100
61	Articles of apparel and clothing accessories, knitted or crocheted	155,163.10	155,163.10	155,163.10	153,304.00	0	0	99
17	Sugars and sugar confectionery	92,363.70	92,357.70	92,357.70	92,001.40	0	0	100
62	Articles of apparel and clothing accessories, not knitted or crocheted	89,953.10	89,953.10	89,953.10	81,785.00	0	0	91
71	Natural or cultured pearls, precious or semi-precious stones, precious metals, metals clad with precious metal, and articles thereof; imitation jewellery; coin	44,833.10	23,761.40	23,761.40	22,945.90	0	0	97
03	Fish and crustaceans, molluscs and other aquatic invertebrates	30,328.10	30,128.40	30,128.40	30,034.20	0	0	100
90	Optical, photographic, cinematographic, measuring, checking, precision, medical or surgical instruments and apparatus; parts and accessories thereof	23,845.20	3,144.50	3,144.50	1,639.60	0	0	52
91	Clocks and watches and parts thereof	18,536.70	18,536.70	18,536.70	17,184.70	0	0	93

EPA Preference Utilization of Mauritius' Exports to the EU, 2018								
HS2	Product Description		Imports (USD thousands)					EPA UR (%)
		Total Value	Dutiable	EPA Eligible	Entering under		Undefined	
					EPA	GSP/LDC		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
85	Electrical machinery and equipment and parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles	16,628.70	13,759.40	13,461.50	27.70	0	0	0
42	Articles of leather; saddlery and harness; travel goods, handbags and similar containers; articles of animal gut (other than silk-worm gut)	12,778.90	12,778.90	12,778.90	12,277.80	0	0	96

Source: Authors calculations from EuroStat data

Appendix 4: Preference Utilisation of Seychelles' Exports into the EU

EPA Preference Utilisation of Seychelles' Exports to the EU, 2018								
HS2	Product Description		Imports (USD thousands)					EPA UR (%)
		Total Value	Dutiable	EPA Eligible	Entering under		Undefined	
					EPA	GSP/LDC		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
16	Preparations of meat, fish or crustaceans, molluscs or other aquatic invertebrates	279,758.20	279,758.20	279,758.20	279,756.50	0	0	100
03	Fish and crustaceans, molluscs and other aquatic invertebrates	58,134.30	43,504.60	43,504.60	42,522.50	0	0	98
27	Mineral fuels, mineral oils and products of their distillation; bituminous substances; mineral waxes	8,869.70	8,869.70	8,869.70	-	0	0	0
90	Optical, photographic, cinematographic, measuring, checking, precision, medical or surgical instruments and apparatus; parts and accessories thereof	1,735.20	26.30	26.30	-	0	0	0
15	Animal or vegetable fats and oils and their cleavage products; prepared edible fats; animal or vegetable waxes	1,062.60	2.30	2.30	-	0	0	0

Source: Authors calculations from EuroStat data

Appendix 5: Preference Utilisation of Zimbabwe's Exports into the EU

EPA Preference Utilisation of Zimbabwe's Exports to the EU, 2018								
HS2	Product Description		Imports (USD thousands)					EPA UR (%)
		Total Value	Dutiable	EPA Eligible	Entering under		Undefined	
					EPA	GSP/LDC		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
72	Iron and steel	167,842.90	46,150.10	46,150.10	44,284.00	0	117,411.40	96
24	Tobacco and manufactured tobacco substitutes	104,438.40	104,438.40	104,438.40	93,230.40	0	0	89
71	Natural or cultured pearls, precious or semi-precious stones, precious metals, metals clad with precious metal, and articles thereof; imitation jewellery; coin	87,142.30	466.40	466.40	465.30	0	0	100
08	Edible fruit and nuts; peel of citrus fruits or melons	48,800.40	47,304.60	47,304.60	46,943.20	0	0	99
41	Hides and skins (other than furskins) and leather	40,238.40	9,599.60	9,599.60	2.30	0	0	0
25	Salt; sulphur; earths and stone; plastering material, lime and cement	24,346.50	-	-	-	0	0	0.0
07	Edible vegetables and certain roots and tubers	22,240.10	22,222.00	22,222.00	22,142.00	0	0	100
09	Coffee, tea, mate and spices	11,546.80	688.00	688.00	666.60	0	0	97
06	Live trees and other plants; bulbs, roots and the like; cut flowers and ornamental foliage	7,723.20	7,723.20	7,723.20	7,416.50	0	0	96
68	Articles of stone, plaster, cement, asbestos, mica or similar materials	4,512.00	605.90	605.90	566.00	0	0	93

Source: Authors calculations from EuroStat data

Appendix 6: Preference Utilisation for Top Ten EU Exports into ESA Countries, in USD million. 2018

	HS2	Chapter	Dutiable	EPA Eligible	Entering using EPA preferences	EPA UR %
Madagascar	84	Nuclear reactors, boilers, machinery and mechanical appliances; parts thereof	103.73	103.73	22.16	21.4
	85	Electrical machinery and equipment and parts thereof.	38.04	38.04	7.98	21.0
	62	Articles of apparel and clothing accessories, not knitted or crocheted	34.92	34.92	0.83	0.0
	87	Vehicles other than railway or tramway rolling-stock, and parts and accessories thereof	26.05	26.05	3.43	13.2
	39	Plastics and plastic products	24.07	24.07	6.00	25.0
	73	Articles of iron or steel	23.48	23.48	10.36	44.1
	52	Cotton	19.62	19.62	-	0.0
	50	Silk	18.98	18.98	-	0.0
	49	Books, newspapers, pictures and other products of the printing industry; manuscripts, typescripts and plans	16.42	16.42	0.13	0.1
	51	Wool, fine and coarse animal hair; yarn and fabrics of horsehair	15.80	15.80	-	0.0
Mauritius	22	Beverages, spirits and vinegar	36.44	36.44	3.69	10%
	72	Iron and steel	19.34	19.34	-	0%
	94	Furniture; medical and surgical furniture; bedding, mattresses, mattress supports, cushions and similar stuffed furnishings; lamps and lighting fittings, not elsewhere specified; illuminated signs, illuminated name-plates and the like; prefabricated	13.46	13.46	0.45	3%
	34	Soaps, organic surface-active agents, washing preparations, lubricating preparations, artificial waxes, prepared waxes, shoe polish, scouring powder and the like, candles and similar products, modelling pastes, dental wax and plaster-based dental pre	10.32	10.32	0.03	0%
	39	Plastics and plastic products	9.24	9.24	0.14	2%
	73	Articles of iron or steel	3.99	3.99	0.07	2%
	32	Tanning or dyeing extracts; tannins and their derivatives; dyes, pigments and other colouring matter; paints and varnishes; putty and other mastics; inks	2.77	2.77	-	0%
	23	Residues and waste from the food industries; prepared animal fodder	2.49	2.49	1.58	63%
	33	Essential oils and resinoids; perfumery, cosmetic or toilet preparations	2.09	2.09	-	0%
	48	Paper and paperboard; articles of paper pulp, paper or paperboard	1.52	1.52	0.00	0%
Seychelles	03	Fish and crustaceans, molluscs and other aquatic invertebrates	141.77	141.77	0.16	0.1
	22	Beverages, spirits and vinegar	7.00	7.0	0.09	1.2
	02	Meat and edible meat offal	3.67	3.67	0.20	5.5
	07	Edible vegetables and certain roots and tubers	1.31	1.31	0.60	45.9
	08	Edible fruit and nuts; peel of citrus fruits or melons	0.95	0.95	0.37	39.2
	09	Coffee, tea, mate and spices	0.93	0.93	0.45	48.6
	16	Preparations of meat, fish or crustaceans, molluscs or other aquatic invertebrates	0.73	0.73	0.32	44.1
	63	Other made up textile articles; sets; worn clothing and worn textile articles; rags	0.70	0.70	0.01	0.1

	HS2	Chapter	Dutiable	EPA Eligible	Entering using EPA preferences	EPA UR %
	21	Miscellaneous edible preparations	0.65	0.65	0.23	34.9
	19	Preparations of cereals, flour, starch or milk; pastrycooks' products	0.48	0.48	0.18	36.5
Zimbabwe	87	Vehicles other than railway or tramway rolling-stock, and parts and accessories thereof	59.35	59.35	-	0.0
	64	Nuclear reactors, boilers, machinery and mechanical appliances; parts thereof	32.68	32.68	1.98	6.0
	30	Pharmaceutical products	19.46	19.46	-	0.0
	04	Dairy produce; birds' eggs; natural honey; edible products of animal origin, not elsewhere specified or included	18.79	18.79	-	0.0
	38	Miscellaneous chemical products	16.75	16.75	0.20	0.1
	85	Electrical machinery and equipment and parts thereof	11.55	11.55	0.96	0.1
	27	Mineral fuels, mineral oils and products of their distillation; bituminous substances; mineral waxes	9.91	9.91	-	0.0
	90	Optical, photographic, cinematographic, measuring, checking, precision, medical or surgical instruments and apparatus; parts and accessories thereof	8.11	8.11	0.14	1.8
	22	Essential oils and resinoids; perfumery, cosmetic or toilet preparations	5.26	5.26	0.40	7.7
	39	Plastics and plastic products	4.02	4.02	0.25	6.3

Source: COMESA Secretariat - COMSTAT

Annex VIII (Chapter 4): Analysis of Trade and Investment Flows

Overview trade agreements that ESA4 countries concluded with third countries.

Mauritius

Year	Name	Overview
1971	GSP	- Beneficiary of the GSP offered by Japan, Norway, Switzerland, the United States, and the customs union of Belarus, Kazakhstan, and Russia.
1984	Indian Ocean Commission (IOC)	<ul style="list-style-type: none"> - Inter-governmental organisation created in 1984 by the Victoria Agreement grouping Comoros, Madagascar, Mauritius, Reunion and Seychelles. - Objectives to strengthen diplomatic, economic and commercial ties between these Indian Ocean islands. - Mauritius and Madagascar are granting trade preferences under the IOC regime. - No customs duties for products that are traded between Madagascar and Mauritius and meet the IOC RoO.
2000	COMESA	<ul style="list-style-type: none"> - Launched in October 2000 with nine Member States. - Consists of 16 Member States trading on a full duty-free and quota-free basis, with the remaining countries at various stages of joining the FTA. - FTA countries, also known as Group 1 Member States trade on a duty-free, quota-free basis. - Imports from COMESA Group I Member States with a valid Certificate of Origin are exempt from customs duties in Mauritius. - 90% tariff reduction to imports from non-FTA (Group II Member States) with valid Certificate of Origin.
2006	Trade and Investment Framework Agreement (TIFA)	<ul style="list-style-type: none"> - Signed in September 2006. - Formal mechanism to address bilateral trade issues and to strengthen trade and investment relations. - Serves as a forum to discuss issues of mutual interest.
2007	Preferential Trade Agreement between Mauritius and Pakistan	<ul style="list-style-type: none"> - Signed in July 2007. - Tariff concessions have been granted on a list of products of export interest to both parties. - Mauritian exporters benefit from preferential tariffs on a number of products such as tuna, fish and garments.

		<ul style="list-style-type: none"> - Pakistan's exporters can benefit from preferential tariffs on various products such as tobacco, textiles and fruit.
2008	SADC	<ul style="list-style-type: none"> - Officially launched in August 2008 by 12 of the 15 Member States. - Implementation started in 2000 with the gradual elimination of customs duties on 85% of tariff lines by 2008. - For Mauritius, tariffs on the remaining sensitive products eliminated since 2014.
2013	Free Trade Agreement between Mauritius and Turkey	<ul style="list-style-type: none"> - Entered into force in June 2013. - Mauritian exporter benefits from duty-free access on all industrial products except for a list of 70 clothing items where duties are phased down over a period of 4 years. - On agricultural products, Mauritius obtained concessions on a list of 46 products such as chilled fish, cut flowers, tropical fruits, sweet biscuits and preserved tuna. - Mauritian importers benefit from preferential tariffs on products other than those in the list of sensitive products.
2015	African Growth and Opportunity Act (AGOA)	<ul style="list-style-type: none"> - In 2015, the US renewed AGOA until September 2025. - Provides duty and quota-free access to the US market for over 6,000 products. - Duty-free export of apparel from Mauritius to the US made from fabric imported from any country.
2021	China	<ul style="list-style-type: none"> - Came into effect in January 2021. - Four main components: trade in goods, trade in services, investment and economic cooperation. - Mauritius benefits from immediate duty-free access on the Chinese market on some 7,504 tariff lines. Tariffs on an additional 723 tariff lines phased out over a 5 to 7-year period. Tariff Rate Quota for 50,000 tonnes of sugar implemented on a progressive basis over a period of 8 years with an initial quantity of 15,000 tonnes. - Trade in services, parties agreed to remove restrictions in more than 100 service sectors, including financial services, telecommunications, Information and Communications Technology, professional services, construction and health services.
2021	UK-ESA EPA	<ul style="list-style-type: none"> - Signed in January 2019 and entered into force in January 2021. - Aim to safeguard trade preferences under the interim EPA with the EU.

2021	AfCFTA	- Aims to create a single continental market for goods and services and to eventually lead to establishment of a Customs Union.
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Source: Own compilation from the different agreements.

Madagascar

Year	Name	Overview
1971	GSP	- Several countries have granted Madagascar GSP privileges including the United States and India.
1992	IOC – Indian Ocean Committee	- Inter-governmental organisation created in 1984 by the Victoria Agreement grouping Comoros, Madagascar, Mauritius, Reunion and Seychelles. - Objectives to strengthen diplomatic, economic and commercial ties between these Indian Ocean islands. - Mauritius and Madagascar are granting trade preferences under the IOC regime. - No customs duties for products that are traded between Madagascar and Mauritius and meet the IOC RoO.
2014	China	- Two commercial and technical cooperation agreements. - Provide Special Preferential Tariff (SPT) treatment for exports under these agreements.
2014	African Growth and Opportunity Act (AGOA)	- Madagascar's AGOA eligibility was restored by the US in December 2014 after a five-year gap. - Close to 7000 items eligible for exemption from import duties.
2021	AfCFTA	- Aims to create a single continental market for goods and services and to eventually lead to establishment of a Customs Union.

Source: Own compilation from the different agreements.

Zimbabwe

Year	Name	Overview
1971	GSP	- Beneficiary GSP offered by Australia, Canada, Japan, New Zealand, Norway, Switzerland, Turkey, the US, and the customs union of Belarus, Kazakhstan, and Russia.
1988	Zimbabwe – Botswana FTA	- Ratified in 1988. - Duty-free trade with a 25 per cent local content requirement.
1992	Zimbabwe – Namibia FTA	- In effect since 1992. - RoO require at least 25 per cent local content for manufactured products, and Zimbabwe and Namibia should be the last place of substantial manufacturing.
1995	Zimbabwe – Malawi FTA	- Implemented in 1995. - 25 per cent domestic value-added requirements.
1997	SADC	- Officially launched in August 2008 by 12 of the 15 Member States. - Implementation started in 2000 with the gradual elimination of customs duties on 85% of tariff lines by 2008.

		- Zimbabwe does not offer full duty access and still maintains duties on a few products.
2004	Zimbabwe – Mozambique FTA	<ul style="list-style-type: none"> - Signed in January 2004 and came into effect in March 2005. - Objective to eliminate tariff and non-tariff barriers and to cooperate in customs and trade promotion. - Duty-free trade with RoO specifying a 25 per cent domestic value-added. - Refined and unrefined sugar, soft drinks, firearms, ammunition, explosives, motor vehicles and cigarettes are excluded.
2020	AfCFTA	<ul style="list-style-type: none"> - Zimbabwe joined AfCFTA in February 2020. - Aims to create a single continental market for goods and services and to eventually lead to the establishment of a Customs Union.

Source: Own compilation from the different agreements.

Seychelles

Year	Name	Overview
1971	GSP	- Benefits from the GSP offered by Australia, Japan, New Zealand, Switzerland and Turkey, the customs union of Belarus, Kazakhstan, and Russia.
1984	Indian Ocean Commission (IOC)	<ul style="list-style-type: none"> - Inter-governmental organisation created in 1984 by the Victoria Agreement grouping Comoros, Madagascar, Mauritius, Reunion and Seychelles. - Objective to strengthen diplomatic, economic and commercial ties between these Indian Ocean islands. - Seychelles provides preferential rates to imports of goods originating from member states in the form of a 5% reduction on the trade tax rates on certain selected products.
1993	COMESA	<ul style="list-style-type: none"> - Became a member in June 1993 when it was still the Preferential Trade Area (PTA) for Eastern and Southern Africa. - Seychelles joined the FTA in November 2007, and COMESA FTA regulations were in effect from May 2009.
1997	SADC	<ul style="list-style-type: none"> - Became a member of the SADC in September 1997 but decided to withdraw its membership due to human and financial constraints in 2004. - Reinitiated process of joining SADC in 2006 and was readmitted by August 2008. - Ratified the SADC Protocol on Trade in April 2015 and formally acceded to FTA in May 2015. - Seychelles eliminated tariffs on 91.7% of its tariff lines for imports from other SADC members. - By 2026, 97.5% of Seychelles' tariffs will be liberalized. - Other SADC parties will liberalize between 93.8% and 100% of their tariffs for imports from Seychelles.
2021	AfCFTA	- Aims to create a single continental market for goods and services and to eventually lead to the establishment of a Customs Union.

Source: Own compilation from the different agreements.

Patterns in ESA4 trade with non-EU jurisdictions and regional trade integration

Table 33: Annual growth rates of ESA4 countries' exports to the rest of the world and countries comprising the regional trade areas of EAC, SADC and COMESA, 2012 – 2019.

Total growth in ESA4 countries' goods exports	WORLD ex EU27	East African Community (EAC)	Southern African Development Community (SADC)	COMESA
Madagascar	17%	25%	12%	11%
Mauritius	3%	21%	3%	12%
Seychelles	16%	-1%	26%	21%
Zimbabwe	9%	64%	-2%	2%

Source: UN Comtrade.

Table 34: Annual growth rates of ESA4 countries' imports from the rest of the world and countries comprising the regional trade areas of EAC, SADC and COMESA, beginning of tariff liberalisation process – 2019.

Total growth in ESA4 countries' goods imports	WORLD ex EU27	East African Community (EAC)	Southern African Development Community (SADC)	COMESA
Madagascar	22%	26%	6%	7%
Mauritius	0%	-4%	4%	3%
Seychelles	9%	-1%	5%	2%
Zimbabwe	-1%	1%	-1%	-1%

Source: UN Comtrade.

Table 35: Development of concentration/diversification among ESA4 countries' top 20 exports to the rest of the world and countries comprising the regional trade areas of EAC, SADC and COMESA.

	2019		2012	
Exports to WORLD ex EU27	Share of top 20 exports	HHI top 20 exports	Share of top 20 exports	HHI top 20 exports
Madagascar	92%	0.15	97%	0.14
Mauritius	69%	0.08	90%	0.14
Seychelles	98%	0.21	91%	0.13
Zimbabwe	93%	0.17	74%	0.16
	2019		2012	
Exports to EAC	Share of top 20 exports	HHI top 20 exports	Share of top 20 exports	HHI top 20 exports
Madagascar	100%	0.24	100%	0.20
Mauritius	99%	0.47	95%	0.18
Seychelles	100%	0.61	100%	0.43

Zimbabwe	100%	0.98	98%	0.12
	2019		2012	
Exports to SADC	Share of top 20 exports	HHI top 20 exports	Share of top 20 exports	HHI top 20 exports
Madagascar	89%	0.09	84%	0.08
Mauritius	72%	0.08	86%	0.14
Seychelles	99%	0.49	96%	0.13
Zimbabwe	91%	0.20	92%	0.17
	2019		2012	
Exports to COMESA	Share of top 20 exports	HHI top 20 exports	Share of top 20 exports	HHI top 20 exports
Madagascar	89%	0.16	80%	0.11
Mauritius	73%	0.10	77%	0.08
Seychelles	100%	0.53	98%	0.16
Zimbabwe	79%	0.21	66%	0.13

Source: UN Comtrade. Note: The EU eliminated import tariffs in 2012. The Herfindahl-Hirschman Index (HHI) is a common measure of commodity concentration of exports and imports. Higher values indicate that exports are concentrated on fewer commodities.

Table 36: Development of concentration/diversification among ESA4 countries' top 20 imports from the rest of the world and countries comprising the regional trade areas of EAC, SADC and COMESA.

	2019		Year marking the begin of the begin of tariff liberalisation process	
Imports from WORLD ex EU27	Share of top 20 imports	HHI top 20 imports	Share of top 20 imports	HHI top 20 imports
Madagascar	54%	0.17	51%	0.15
Mauritius	49%	0.19	53%	0.23
Seychelles	64%	0.32	59%	0.32
Zimbabwe	55%	0.29	57%	0.22
	2019		Year marking the begin of the begin of tariff liberalisation process	
Imports from EAC	Share of top 20 imports	HHI top 20 imports	Share of top 20 imports	HHI top 20 imports
Madagascar	97%	0.21	88%	0.11
Mauritius	99%	0.64	99%	0.51
Seychelles	76%	0.14	80%	0.14
Zimbabwe	94%	0.15	90%	0.14
	2019		Year marking the begin of the begin of tariff liberalisation process	
Imports from SADC	Share of top 20 imports	HHI top 20 imports	Share of top 20 imports	HHI top 20 imports

Madagascar	59%	0.07	71%	0.07
Mauritius	69%	0.13	59%	0.13
Seychelles	35%	0.07	43%	0.07
Zimbabwe	39%	0.06	41%	0.08
	2019		Year marking the begin of the begin of tariff liberalisation process	
Imports from COMESA	Share of top 20 imports	HHI top 20 imports	Share of top 20 imports	HHI top 20 imports
Madagascar	69%	0.09	79%	0.08
Mauritius	89%	0.17	88%	0.19
Seychelles	43%	0.06	57%	0.09
Zimbabwe	68%	0.08	74%	0.07

Source: UN Comtrade. Note: The EU eliminated import tariffs in 2012. Mauritius and Seychelles started liberalising tariffs on EU imports in 2013 and Madagascar and Zimbabwe started liberalising in 2016 and 2017 respectively. Source: UN Comtrade. Note: The EU eliminated import tariffs in 2012. The Herfindahl-Hirschman Index (HHI) is a common measure of commodity concentration of exports and imports. Higher values indicate that exports are concentrated on fewer commodities.

Madagascar

Madagascar's goods exports to the EU

Table 37: Top 20 exports, Madagascar to EU27, 2009, 2012, 2019 (Eurostat data), trade value in million EUR, HS 2, sorted by 2019 trade value

	2009	2012	2019	CAGR 2009-12	CAGR 2012-19
Total	421.4	554.1	988.7	9.6%	8.6%
COFFEE, TEA, MATE AND SPICES (1988-2500)	25.6	42.4	257.1	18.3%	29.4%
ARTICLES OF APPAREL AND CLOTHING ACCESSORIES, NOT KNITTED OR CROCHETED (1988-2500)	83.3	115.9	192.7	11.6%	7.5%
ARTICLES OF APPAREL AND CLOTHING ACCESSORIES, KNITTED OR CROCHETED (1988-2500)	90.4	109.9	134.7	6.7%	3.0%
FISH AND CRUSTACEANS, MOLLUSCS AND OTHER AQUATIC INVERTEBRATES (1988-2500)	80.5	90.6	81.4	4.0%	-1.5%
NICKEL AND ARTICLES THEREOF (1988-2500)	N/A	0.0	57.9	N/A	1185.1 %
EDIBLE FRUIT AND NUTS; PEEL OF CITRUS FRUIT OR MELONS (1988-2500)	17.8	25.2	34.3	12.4%	4.5%
PREPARATIONS OF VEGETABLES, FRUIT, NUTS OR OTHER PARTS OF PLANTS (1988-2500)	8.4	11.9	28.4	12.3%	13.2%
PREPARATIONS OF MEAT, OF FISH OR OF CRUSTACEANS, MOLLUSCS OR OTHER AQUATIC INVERTEBRATES (1988-2500)	24.0	35.3	26.3	13.7%	-4.1%
OTHER BASE METALS; CERMETS; ARTICLES THEREOF (1988-2500)	N/A	N/A	24.6	N/A	N/A
ESSENTIAL OILS AND RESINOIDS; PERFUMERY, COSMETIC OR TOILET PREPARATIONS (1988-2500)	7.1	9.0	22.0	8.5%	13.6%
COCOA AND COCOA PREPARATIONS (1988-2500)	17.4	11.1	16.3	-13.9%	5.6%
NATURAL OR CULTURED PEARLS, PRECIOUS OR SEMI-PRECIOUS STONES, PRECIOUS METALS, METALS CLAD WITH PRECIOUS METAL, AND ARTICLES THEREOF; IMITATION JEWELLERY; COIN (1988-2500)	1.9	4.1	11.4	29.0%	15.7%
EDIBLE VEGETABLES AND CERTAIN ROOTS AND TUBERS (1988-2500)	4.5	9.3	9.7	26.9%	0.6%
CLOCKS AND WATCHES AND PARTS THEREOF (1988-2500)	5.3	7.9	8.8	14.1%	1.5%
MANUFACTURES OF STRAW, OF ESPARTO OR OTHER PLAITING MATERIALS; BASKETWARE AND WICKERWORK (1988-2500)	4.0	4.6	8.3	4.6%	8.8%
SALT; SULPHUR; EARTHS AND STONE; PLASTERING MATERIALS, LIME AND CEMENT (1988-2500)	3.2	3.9	7.8	6.7%	10.2%
ARTICLES OF LEATHER; SADDLERY AND HARNESS; TRAVEL GOODS, HANDBAGS AND SIMILAR CONTAINERS; ARTICLES OF ANIMAL GUT (OTHER THAN SILKWORM GUT) (1988-2500)	2.4	12.6	6.9	73.6%	-8.2%
WADDING, FELT AND NONWOVENS; SPECIAL YARNS; TWINE, CORDAGE, ROPES AND CABLES AND ARTICLES THEREOF (1988-2500)	5.2	7.4	5.6	12.7%	-4.0%
OIL SEEDS AND OLEAGINOUS FRUITS; MISCELLANEOUS GRAINS, SEEDS AND FRUIT; INDUSTRIAL OR MEDICINAL PLANTS; STRAW AND FODDER (1988-2500)	1.0	1.9	4.5	23.7%	12.9%

	2009	2012	2019	CAGR 2009-12	CAGR 2012-19
OTHER MADE-UP TEXTILE ARTICLES; SETS; WORN CLOTHING AND WORN TEXTILE ARTICLES; RAGS (1988-2500)	1.8	2.6	3.9	13.7%	5.7%
Share top 5 imports	66%	65%	73%		
Share top 10 imports	80%	79%	87%		
Share top 20 imports	91%	91%	95%		

Source: Eurostat

Table 38: Top 20 exports, Madagascar to EU27, 2009, 2012, 2019, (UN Comtrade data), trade value in million USD, HS 4, sorted by 2019 trade value

	2019				2012				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
1	905	Vanilla.	243.4	24.6%	6110	Jerseys, pullovers, cardigans, wais	98.0	17.1%	6110	Jerseys, pullovers, cardigans, wais	108.3	19.4%
2	6110	Jerseys, pullovers, cardigans, wais	96.0	9.7%	306	Crustaceans, whether in shell or no	57.1	9.9%	306	Crustaceans, whether in shell or no	76.2	13.6%
3	306	Crustaceans, whether in shell or no	83.4	8.4%	2710	Petroleum oils and oils obtained	44.6	7.8%	2710	Petroleum oils and oils obtained	27.8	5.0%
4	7502	Unwrought nickel.	77.3	7.8%	6214	Shawls, scarves, mufflers, mantilla	38.1	6.6%	6214	Shawls, scarves, mufflers, mantilla	26.4	4.7%
5	8105	Cobalt mattes and other intermediates	39.0	3.9%	1604	Prepared or preserved fish; caviar	37.7	6.6%	6203	Men's or boys' suits, ensembles	25.2	4.5%
6	6203	Men's or boys' suits, ensembles	38.8	3.9%	6203	Men's or boys' suits, ensembles	27.5	4.8%	1604	Prepared or preserved fish; caviar	22.7	4.1%
7	2710	Petroleum oils and oils obtained	37.8	3.8%	6204	Women's or girls' suits, ensembles,	20.7	3.6%	905	Vanilla.	21.2	3.8%
8	2005	Other vegetables prepared	32.8	3.3%	7502	Unwrought nickel.	18.1	3.1%	1701	Cane or beet sugar and chemically p	19.0	3.4%
9	1604	Prepared or preserved fish; caviar	29.7	3.0%	4205	Other articles of leather or com	14.2	2.5%	6204	Women's or girls' suits, ensembles,	16.2	2.9%

	2019				2012				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
10	3301	Essential oils (terpeneless or not)	26.0	2.6%	2005	Other vegetables prepared	13.3	2.3%	1801	Cocoa beans, whole or broken, raw o	13.2	2.4%
11	1801	Cocoa beans, whole or broken, raw o	24.4	2.5%	1701	Cane or beet sugar and chemically p	13.1	2.3%	812	Fruit and nuts, provisionally present	12.0	2.2%
12	6204	Women's or girls' suits, ensembles,	20.3	2.0%	6206	Women's or girls' blouses, shirts a	10.4	1.8%	6205	Men's or boys' shirts.	11.9	2.1%
13	6205	Men's or boys' shirts.	15.7	1.6%	812	Fruit and nuts, provisionally present	9.9	1.7%	3301	Essential oils (terpeneless or not)	10.5	1.9%
14	6209	Babies' garments and clothing acces	13.5	1.4%	907	Cloves (whole fruit, cloves and ste	9.4	1.6%	2005	Other vegetables prepared or preser	10.0	1.8%
15	6206	Women's or girls' blouses, shirts a	13.3	1.3%	6209	Babies' garments and clothing acces	8.4	1.5%	6206	Women's or girls' blouses, shirts a	9.2	1.6%
16	1302	Vegetable saps and extracts; pectic	13.3	1.3%	5607	Twine, cordage, ropes and cables, w	8.1	1.4%	6209	Babies' garments and clothing access	7.9	1.4%
17	6201	Men's or boys' overcoats, car-coats	9.6	1.0%	6205	Men's or boys' shirts.	7.6	1.3%	6109	T-shirts, singlets and other vests,	6.5	1.2%
18	9113	Watch straps, watch bands and watch	9.3	0.9%	3301	Essential oils (terpeneless or not)	7.5	1.3%	8523	Discs, tapes, solid-state non-volat	5.6	1.0%
19	812	Fruit and nuts, provisionally prese	9.0	0.9%	905	Vanilla.	6.7	1.2%	1302	Vegetable saps and extracts; pectic	5.6	1.0%
20	6109	T-shirts, singlets and other vests,	7.5	0.8%	6211	Tracksuits, ski suits and swimwear	6.5	1.1%	4205	Other articles of leather or com	5.6	1.0%
		Total goods exports	990.7	100.0%		Total goods exports	574.2	100.0%		Total goods exports	559.6	100.0%

	2019				2012				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
		Total of top 5 exports	539.1	54%			275.4	48%			263.9	47%
		HHI top 5	0.3				0.2				0.3	
		Total of top 10 exports	704.2	71%			369.1	64%			356.2	64%
		HHI top 10	0.18				0.14				0.17	
		Total of top 20 exports	840.0	84.8%			456.7	79.5%			441.1	78.8%
		HHI top 20	0.13				0.10				0.11	

Source: UN Comtrade data

Table 39: Top 20 exports, Madagascar to EU27, compound annual growth rate (CAGR), 2012-2019, 2009-2012, sorted by 2019 trade value.

	2019	2019	2019	2012	2009	Post tariff elimination	Pre tariff elimination
	Product code	Description	Trade value in million USD	Trade value in million USD	Trade value in million USD	CAGR 2012 - 2019	CAGR 2009 - 2012
1	905	Vanilla.	243.4	6.7	21.2	67.0%	-31.8%
2	6110	Jerseys, pullovers, cardigans, wais	96.0	98.0	108.3	-0.3%	-3.3%
3	306	Crustaceans, whether in shell or no	83.4	57.1	76.2	5.6%	-9.2%
4	7502	Unwrought nickel.	77.3	18.1	n/a	23.1%	n/a
5	8105	Cobalt mattes and other intermediat	39.0	6.1	n/a	30.3%	n/a
6	6203	Men's or boys' suits, ensembles, ja	38.8	27.5	25.2	5.0%	2.9%
7	2710	Petroleum oils and oils obtained fr	37.8	44.6	27.8	-2.3%	17.1%
8	2005	Other vegetables prepared or preser	32.8	13.3	10.0	13.7%	9.9%
9	1604	Prepared or preserved fish; caviar	29.7	37.7	22.7	-3.4%	18.3%
10	3301	Essential oils (terpeneless or not)	26.0	7.5	10.5	19.5%	-10.8%
11	1801	Cocoa beans, whole or broken, raw o	24.4	5.2	13.2	24.8%	-26.8%
12	6204	Women's or girls' suits, ensembles,	20.3	20.7	16.2	-0.3%	8.5%
13	6205	Men's or boys' shirts.	15.7	7.6	11.9	10.9%	-13.8%
14	6209	Babies' garments and clothing acces	13.5	8.4	7.9	7.0%	2.0%
15	6206	Women's or girls' blouses, shirts a	13.3	10.4	9.2	3.6%	4.2%
16	1302	Vegetable saps and extracts; pectic	13.3	2.7	5.6	25.6%	-21.7%
17	6201	Men's or boys' overcoats, car-coats	9.6	3.2	1.9	17.1%	19.2%
18	9113	Watch straps, watch bands and watch	9.3	3.2	2.2	16.4%	13.4%
19	812	Fruit and nuts, provisionally prese	9.0	9.9	12.0	-1.4%	-6.3%
20	6109	T-shirts, singlets and other vests,	7.5	3.1	6.5	13.5%	-22.0%
		Total goods exports	990.7	574.2	559.6	8.1%	0.9%

Source: UN Comtrade data

Madagascar's goods imports from the EU

Table 40: Top 20 imports, Madagascar from EU27, 2009, 2012, 2019 (Eurostat data), trade value in million EUR, HS 2, sorted by 2019 trade value.

	2009	2016	2019	CAGR 2009 - 2016	CAGR 2016 - 2019
Total	403.9	534.1	662.3	4.1%	7.4%
NUCLEAR REACTORS, BOILERS, MACHINERY AND MECHANICAL APPLIANCES; PARTS THEREOF (1988-2500)	99.3	86.7	100.7	-1.9%	5.1%
PHARMACEUTICAL PRODUCTS (1988-2500)	28.6	48.2	66.2	7.7%	11.2%
ELECTRICAL MACHINERY AND EQUIPMENT AND PARTS THEREOF; SOUND RECORDERS AND REPRODUCERS, TELEVISION IMAGE AND SOUND RECORDERS AND REPRODUCERS, AND PARTS AND ACCESSORIES OF SUCH ARTICLES (1988-2500)	54.3	40.2	54.4	-4.2%	10.6%
VEHICLES OTHER THAN RAILWAY OR TRAMWAY ROLLING STOCK, AND PARTS AND ACCESSORIES THEREOF (1988-2500)	26.8	34.8	44.9	3.8%	8.8%
SILK (1988-2500)	15.2	34.3	37.7	12.3%	3.2%
ARTICLES OF APPAREL AND CLOTHING ACCESSORIES, NOT KNITTED OR CROCHETED (1988-2500)	0.9	9.7	23.4	40.0%	33.8%
PLASTICS AND ARTICLES THEREOF (1988-2500)	7.9	16.9	19.7	11.5%	5.3%
RESIDUES AND WASTE FROM THE FOOD INDUSTRIES; PREPARED ANIMAL FODDER (1988-2500)	9.8	14.2	17.8	5.4%	7.8%
OPTICAL, PHOTOGRAPHIC, CINEMATOGRAPHIC, MEASURING, CHECKING, PRECISION, MEDICAL OR SURGICAL INSTRUMENTS AND APPARATUS; PARTS AND ACCESSORIES THEREOF (1988-2500)	6.4	9.8	15.2	6.3%	15.9%
WOOL, FINE OR COARSE ANIMAL HAIR; HORSEHAIR YARN AND WOVEN FABRIC (1988-2500)	12.0	15.4	14.4	3.7%	-2.2%
ARTICLES OF IRON OR STEEL (1988-2500)	13.8	12.1	13.9	-1.8%	4.7%
COTTON (1988-2500)	6.2	9.4	13.1	6.2%	11.7%
PRINTED BOOKS, NEWSPAPERS, PICTURES AND OTHER PRODUCTS OF THE PRINTING INDUSTRY; MANUSCRIPTS, TYPESCRIPTS AND PLANS (1988-2500)	7.2	5.9	11.9	-2.8%	26.2%
MISCELLANEOUS EDIBLE PREPARATIONS (1988-2500)	3.1	7.0	11.4	12.5%	17.6%
FURNITURE; BEDDING, MATTRESSES, MATTRESS SUPPORTS, CUSHIONS AND SIMILAR STUFFED FURNISHINGS; LAMPS AND LIGHTING FITTINGS, NOT ELSEWHERE SPECIFIED OR INCLUDED; ILLUMINATED SIGNS, ILLUMINATED NAMEPLATES AND THE LIKE; PREFABRICATED BUILDINGS (1988-2500)	3.7	6.0	10.9	7.1%	21.9%
PAPER AND PAPERBOARD; ARTICLES OF PAPER PULP, OF PAPER OR PAPERBOARD (1988-2500)	4.1	6.3	10.6	6.3%	18.9%
SPECIAL WOVEN FABRICS; TUFTED TEXTILE FABRICS; LACE; TAPESTRIES; TRIMMINGS; EMBROIDERY (1988-2500)	2.9	7.1	10.6	13.6%	14.1%
PREPARATIONS OF CEREALS, FLOUR, STARCH OR MILK; PASTRYCOOKS' PRODUCTS (1988-2500)	3.8	6.6	9.7	8.0%	13.7%
CLOCKS AND WATCHES AND PARTS THEREOF (1988-2500)	2.4	5.8	9.1	13.7%	16.0%
MISCELLANEOUS CHEMICAL PRODUCTS (1988-2500)	4.2	9.2	8.7	11.7%	-1.8%

	2009	2016	2019	CAGR 2009 - 2016	CAGR 2016 - 2019
Share top 5 exports	56%	46%	46%		
Share top 10 exports	65%	58%	60%		
Share top 20 exports	77%	72%	76%		

Source: Eurostat

Table 41: Top 20 imports, Madagascar from EU27, 2009, 2012, 2019 (UN Comtrade data), trade value in million USD, HS 4, sorted by 2019 trade value

	2019				2016				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
1	3004	Medicaments (excluding goods of health)	63.9	7.7%	3004	Medicaments (excluding goods of health)	22.7	4.7%	8474	Machinery for sorting, screening, s	37.4	5.2%
2	6214	Shawls, scarves, mufflers, mantilla	38.3	4.6%	8704	Motor vehicles for transport	15.6	3.2%	3004	Medicaments (excluding goods of health)	24.4	3.4%
3	4907	Unused postage, revenue or similar	34.0	4.1%	2309	Preparations of a kind used in animals	15.3	3.2%	8703	Motor cars and other motor vehicles	24.0	3.4%
4	8704	Motor vehicles for the transport	32.7	3.9%	8703	Motor cars and other motor vehicles	13.5	2.8%	8419	Machinery, plant or laboratory equipment	21.8	3.0%
5	8703	Motor cars and other motor vehicles	28.5	3.4%	6309	Worn clothing and other worn articles	13.0	2.7%	5007	Woven fabrics of silk	20.8	2.9%
6	5007	Woven fabrics of silk	26.7	3.2%	1107	Malt, whether or not roasted.	10.9	2.2%	8413	Pumps for liquids, whether	18.0	2.5%
7	8802	Other aircraft (for example, helicopter)	21.4	2.6%	7010	Carboys, bottles, flasks, jars, pot	10.2	2.1%	8479	Machines and mechanical appliances	17.1	2.4%
8	2309	Preparations of a kind used in animals	19.9	2.4%	8413	Pumps for liquids, whether	7.7	1.6%	8704	Motor vehicles for the transport	15.9	2.2%

	2019				2016				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
9	5112	Woven fabrics of combed wool	13.3	1.6%	303	Fish, frozen, excluding fish fillet	7.5	1.5%	7308	Structures (excluding prefabricated)	15.0	2.1%
10	8413	Pumps for liquids, whether	11.4	1.4%	8701	Tractors (other than tractors of he	7.2	1.5%	8517	Telephone sets, including telephone	15.0	2.1%
11	1107	Malt, whether or not roasted.	10.5	1.3%	8438	Machinery, not specified or included	6.6	1.4%	2309	Preparations of a kind used in animals	12.9	1.8%
12	8517	Telephone sets, including telephone	10.4	1.2%	8481	Taps, cocks, valves and similar app	5.9	1.2%	8537	Boards, panels, consoles, desks,	12.8	1.8%
13	8471	Automatic data processing machines	10.0	1.2%	5211	Woven fabrics of cotton, containing	5.7	1.2%	5112	Woven fabrics of combed wool	12.8	1.8%
14	3002	Human blood; animal blood prepared	10.0	1.2%	8421	Centrifuges, including centrifugal	5.5	1.1%	7214	Other bars and rods of iron or non-iron	11.9	1.7%
15	6309	Worn clothing and other worn articles	8.9	1.1%	4907	Unused postage, revenue or similar	5.5	1.1%	1107	Malt, whether or not roasted.	11.5	1.6%
16	303	Fish, frozen, excluding fish fillet	8.0	1.0%	8703	Motor cars and other motor vehicles	5.4	1.1%	4907	Unused postage, revenue or similar	11.1	1.5%
17	5211	Woven fabrics of cotton, containing	7.6	0.9%	8544	Insulated (including enamelled	5.1	1.1%	8504	Electrical transformers, static	10.5	1.5%
18	8544	Insulated (including enamelled	7.1	0.9%	3004	Medicaments (excluding goods of health	5.1	1.0%	3002	Human blood; animal blood prepared	9.9	1.4%
19	402	Milk and cream, concentrated	6.9	0.8%	7308	Structures (excluding prefabricated	4.7	1.0%	8502	Electric generating sets and rotary	9.7	1.4%
20	3006	Pharmaceutical goods specified	6.8	0.8%	3006	Pharmaceutical goods specified	4.7	1.0%	8421	Centrifuges, including centrifugal	9.2	1.3%
		Total goods imports from EU27	834.6	100.0%		Total goods imports from EU27	486.7	100.0%		Total goods imports from EU27	715.5	100.0%

2019					2016				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
		Total of top 5 exports	197.4	24%			80.1	16%			128.4	18%
		HHI top 5	0.2				0.2				0.2	
		Total of top 10 exports	290.2	35%			123.6	25%			209.5	29%
		HHI top 10	0.12				0.11				0.11	
		Total of top 20 exports	376.3	45.1%			177.9	36.5%			321.7	45.0%
		HHI top 20	0.08				0.06				0.06	

Source: UN Comtrade data

Table 42: Top 20 imports, Madagascar from EU27, compound annual growth rate (CAGR), 2012-2019, 2009-2012, sorted by 2019 trade value

	2019	2019	2019	2016	2009	Post tariff elimination	Pre tariff elimination
	Product code	Description	Trade value in million USD	Trade value in million USD	Trade value in million USD	CAGR 2016 - 2019	CAGR 2009 - 2016
1	3004	Medicaments (excluding goods of health)	63.9	22.7	24.4	41.1%	-1.0%
2	6214	Shawls, scarves, mufflers, mantilla	38.3	0.0	0.2	3015.8%	-52.3%
3	4907	Unused postage, revenue or similar	34.0	5.5	11.1	83.5%	-9.5%
4	8704	Motor vehicles for the transport	32.7	15.6	15.9	28.1%	-0.3%
5	8703	Motor cars and other motor vehicles	28.5	13.5	24.0	28.2%	-7.9%
6	5007	Woven fabrics of silk	26.7	1.8	20.8	146.4%	-29.6%
7	8802	Other aircraft (for example, helicopter)	21.4	0.1	0.2	482.5%	-6.2%
8	2309	Preparations of a kind used in animals	19.9	15.3	12.9	9.2%	2.5%
9	5112	Woven fabrics of combed wool	13.3	0.6	12.8	178.5%	-35.1%

	2019	2019	2019	2016	2009	Post tariff elimination	Pre tariff elimination
	Product code	Description	Trade value in million USD	Trade value in million USD	Trade value in million USD	CAGR 2016 - 2019	CAGR 2009 - 2016
10	8413	Pumps for liquids, whether or not fuel	11.4	7.7	18.0	13.9%	-11.3%
11	1107	Malt, whether or not roasted.	10.5	10.9	11.5	-1.1%	-0.8%
12	8517	Telephone sets, including telephone	10.4	2.4	15.0	63.6%	-23.1%
13	8471	Automatic data processing machines	10.0	2.6	7.9	57.8%	-14.9%
14	3002	Human blood; animal blood prepared	10.0	1.0	9.9	112.7%	-27.6%
15	6309	Worn clothing and other worn articles	8.9	13.0	7.7	-12.0%	7.8%
16	303	Fish, frozen, excluding fish fillet	8.0	7.5	0.3	1.9%	59.2%
17	5211	Woven fabrics of cotton, containing	7.6	5.7	2.4	9.9%	13.4%
18	8544	Insulated (including enamelled	7.1	5.1	7.1	11.6%	-4.6%
19	402	Milk and cream, concentrated	6.9	4.5	2.2	14.7%	10.6%
20	3006	Pharmaceutical goods specified	6.8	4.7	4.3	12.6%	1.5%
		Total goods imports from EU27	834.6	486.7	715.5	8.0%	-12.1%

Source: UN Comtrade data

Madagascar's goods exports to non-EU jurisdictions

Table 43: Top 20 exports Madagascar to WORLD ex EU27

Top 20 exports Madagascar to WORLD ex EU27 in 2019					Top 20 exports Madagascar to WORLD ex EU27 in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	6110	Unwrought nickel.	375.0	24.2%	1		Cloves (whole fruit, cloves and ste	157.8	30.2%
2	907	Vanilla.	340.9	22.0%	2		Titanium ores and concentrates.	72.2	13.8%
3	7502	Titanium ores and concentrates.	95.1	6.1%	3		Niobium, tantalum, vanadium or zirc	44.0	8.4%
4	2615	Gold (including gold plated with pl	87.0	5.6%	4		Unwrought nickel.	41.3	7.9%
5	6203	Cloves (whole fruit, cloves	73.5	4.7%	5		Petroleum oils and oils obtained fr	36.3	6.9%
6	2614	Cobalt mattes and other intermediate	62.3	4.0%	6		Precious stones (other than diamond	22.8	4.4%
7	6214	Men's or boys' suits, ensembles,	44.5	2.9%	7		Chromium ores and concentrates.	18.8	3.6%
8	713	Men's or boys' shirts.	44.1	2.8%	8		Jerseys, pullovers, cardigans,	18.4	3.5%
9	1604	Petroleum oils and oils obtained fr	40.3	2.6%	9		Dried leguminous vegetables, shelled	16.2	3.1%
10	7103	Essential oils (terpeneless or not)	35.3	2.3%	10		Woven fabrics of cotton, containing	14.3	2.7%
11	6204	Women's or girls' suits, ensembles,	34.5	2.2%	11		Ferrous waste and scrap; remelting	11.2	2.1%
12	2610	T-shirts, singlets and other vests,	33.4	2.2%	12		T-shirts, singlets and other vests,	8.8	1.7%
13	2005	Precious stones (other than diamond	27.9	1.8%	13		Crustaceans, whether in a shell or no shell	8.3	1.6%
14	6205	Dried leguminous vegetables, shelled	22.5	1.5%	14		Essential oils (terpeneless or not)	6.8	1.3%
15	6109	Niobium, tantalum, vanadium or zirc	22.0	1.4%	15		Coconut, abaca (Manila hemp or Musa	5.3	1.0%

Top 20 exports Madagascar to WORLD ex EU27 in 2019					Top 20 exports Madagascar to WORLD ex EU27 in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
16	2710	Jerseys, pullovers, cardigans,	21.6	1.4%	16		Men's or boys' suits, ensembles,	5.1	1.0%
17	5208	Vegetable saps and extracts; pectic	21.6	1.4%	17		Ground-nuts, not roasted or otherwi	5.1	1.0%
18	7204	Natural graphite.	16.9	1.1%	18		Raw hides and skins of bovine (incl	5.0	1.0%
19	812	Men's or boys' shirts, knitted	13.9	0.9%	19		Cartons, boxes, cases, bags and other	4.7	0.9%
20	6209	Woven fabrics of cotton, containing	13.6	0.9%	20		Men's or boys' shirts.	4.4	0.8%
		Total goods exports	1551.3	100.0%			Total goods exports	522.8	100.0%
		Total of top 5 exports	971.4	63%			Total of top 5 exports	351.5	67.2%
		HHI top 5	0.3				HHI top 5	0.3	
		Total of top 10 exports	1197.9	77.2%			Total of top 10 exports	442.1	84.6%
		HHI top 10	0.20				HHI top 10	0.19	
		Total of top 20 exports	1425.9	91.9%			Total of top 20 exports	507.0	97.0%
		HHI top 20	0.15				HHI top 20	0.14	

Source: UN Comtrade data

Table 44: Top 20 exports Madagascar to EAC

Top 20 exports Madagascar to EAC in 2019					Top 20 exports Madagascar to EAC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	1701	Cane or beet sugar and chemically p	7.1	35.1%	1	2710	Petroleum oils and oils obtained fr	1.3	29.8%
2	3301	Essential oils (terpeneless or not)	4.2	20.7%	2	8474	Machinery for sorting, screening, s	1.0	22.8%
3	3102	Mineral or chemical fertilisers, ni	3.9	19.5%	3	2106	Food preparations not elsewhere spe	0.9	21.8%

Top 20 exports Madagascar to EAC in 2019					Top 20 exports Madagascar to EAC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
4	2710	Petroleum oils and oils	3.8	19.0%	4	907	Cloves (whole fruit, cloves	0.3	7.0%
5	2106	Food preparations not elsewhere spe	0.9	4.4%	5	902	Tea, whether or not flavoured.	0.2	5.4%
6	8517	Telephone sets, including telephone	0.1	0.4%	6	9999	Commodities not specified according	0.1	3.5%
7	9999	Commodities not specified according	0.1	0.3%	7	8705	Special purpose motor vehicles, oth	0.1	3.0%
8	5208	Woven fabrics of cotton, containing	0.0	0.2%	8	7204	Ferrous waste and scrap; remelting	0.1	1.3%
9	8513	Portable electric lamps	0.0	0.2%	9	8429	Self-propelled bulldozers, angledoz	0.1	1.3%
10	8541	Diodes, transistors and similar sem	0.0	0.1%	10	8701	Tractors (other than tractors of he	0.0	1.2%
11	1515	Other fixed vegetable fats and oils	0.0	0.1%	11	5208	Woven fabrics of cotton, containing	0.0	1.1%
12	8527	Reception apparatus for radio-broad	0.0	0.0%	12	6109	T-shirts, singlets and other vests,	0.0	0.4%
13	812	Fruit and nuts, provisionally prese	0.0	0.0%	13	8502	Electric generating sets and rotary	0.0	0.3%
14	8502	Electric generating sets and rotary	0.0	0.0%	14	5209	Woven fabrics of cotton, containing	0.0	0.3%
15	905	Vanilla.	0.0	0.0%	15	8708	Parts and accessories of the motor	0.0	0.2%
16	4602	Basketwork, wickerwork and other ar	0.0	0.0%	16	8443	Printing machinery used for printin	0.0	0.1%
17	301	Live fish.	0.0	0.0%	17	6301	Blankets and travelling rugs.	0.0	0.1%
18	9403	Other furniture and parts thereof.	0.0	0.0%	18	8479	Machines and mechanical appliances	0.0	0.1%
19	6211	Track suits, ski suits and swimwear	0.0	0.0%	19	9031	Measuring or checking instruments,	0.0	0.1%

Top 20 exports Madagascar to EAC in 2019					Top 20 exports Madagascar to EAC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
20	9030	Oscilloscopes, spectrum analysers a	0.0	0.0%	20	8609	Containers (including containers fo	0.0	0.0%
		Total goods exports	20.2	100.0%			Total goods exports	4.2	100.0%
		Total of top 5 exports	20.0	99%			Total of top 5 exports	3.7	87%
		HHI top 5	0.2				HHI top 5	0.3	
		Total of top 10 exports	20.2	99.7%			Total of top 10 exports	4.1	97.0%
		HHI top 10	0.24				HHI top 10	0.21	
		Total of top 20 exports	20.2	100.0%			Total of top 20 exports	4.2	99.7%
		HHI top 20	0.24				HHI top 20	0.20	

Source: UN Comtrade data

Table 45: Top 20 exports Madagascar to SADC

Top 20 exports Madagascar to SADC in 2019					Top 20 exports Madagascar to SADC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	905	Vanilla.	22.9	16.8%	1	2710	Petroleum oils and oils	7.5	12.0%
2	6109	T-shirts, singlets and other vests,	14.1	10.3%	2	6110	Jerseys, pullovers, cardigans, wais	7.3	11.7%
3	6205	Men's or boys' shirts.	13.4	9.8%	3	2614	Titanium ores and concentrates.	7.2	11.7%
4	6110	Jerseys, pullovers, cardigans, wais	11.7	8.6%	4	6205	Men's or boys' shirts.	4.2	6.7%
5	8105	Cobalt mattes and others	11.4	8.3%	5	6109	T-shirts, singlets and other vests,	3.9	6.4%
6	3102	Mineral or chemical fertilisers,	8.5	6.2%	6	713	Dried leguminous vegetables, shelled	2.5	4.1%
7	2710	Petroleum oils and oils	5.5	4.0%	7	907	Cloves (whole fruit, cloves	2.4	3.9%

Top 20 exports Madagascar to SADC in 2019					Top 20 exports Madagascar to SADC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
8	6203	Men's or boys' suits, ensembles,	5.2	3.8%	8	6206	Women's or girls' blouses, shirts a	2.3	3.8%
9	6206	Women's or girls' blouses, shirts	4.9	3.6%	9	4819	Cartons, boxes, cases, bags and others	2.1	3.5%
10	6105	Men's or boys' shirts, knitted	4.1	3.0%	10	4407	Wood sawn or chipped lengthwise	2.0	3.2%
11	6204	Women's or girls' suits, ensembles,	3.8	2.8%	11	6114	Other garments, knitted or crochete	1.7	2.7%
12	4407	Wood sawed or chipped lengthwise,	3.3	2.4%	12	6203	Men's or boys' suits, ensembles,	1.5	2.5%
13	5201	Cotton, not carded or combed.	2.5	1.8%	13	6105	Men's or boys' shirts, knitted	1.4	2.3%
14	4819	Cartons, boxes, cases, bags and others	1.9	1.4%	14	2501	Salt (including table salt	1.1	1.7%
15	6103	Men's or boys' suits, ensembles,	1.8	1.3%	15	6204	Women's or girls' suits, ensembles,	1.0	1.6%
16	6104	Women's or girls' suits, ensembles,	1.8	1.3%	16	8474	Machinery for sorting, screening, s	1.0	1.6%
17	6108	Women's or girls' slips, petticoats	1.7	1.3%	17	306	Crustaceans, whether in shell	0.9	1.4%
18	1605	Crustaceans, molluscs and others	1.2	0.9%	18	307	Molluscs, whether in shell or not,	0.9	1.4%
19	8802	Other aircraft (for example, helico	0.9	0.7%	19	2106	Food preparations not elsewhere	0.8	1.3%
20	2106	Food preparations not elsewhere spe	0.9	0.6%	20	4818	Toilet paper and similar paper,	0.7	1.1%
		Total goods exports	136.9	100.0%			Total goods exports	62.0	100.0%
		Total of top 5 exports	73.5	54%			Total of top 5 exports	30.1	48%
		HHI top 5	0.2				HHI top 5	0.2	
		Total of top 10 exports	101.7	74.3%			Total of top 10 exports	41.5	66.9%

Top 20 exports Madagascar to SADC in 2019					Top 20 exports Madagascar to SADC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
		HHI top 10	0.13				HHI top 10	0.13	
		Total of top 20 exports	121.6	88.9%			Total of top 20 exports	52.4	84.4%
		HHI top 20	0.09				HHI top 20	0.08	

Source: UN Comtrade data

Table 46: Top 20 exports Madagascar to COMESA

Top 20 exports Madagascar to COMESA in 2019					Top 20 exports Madagascar to COMESA in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	905	Vanilla.	21.9	28.3%	1	2710	Petroleum oils and oils obtained fr	7.8	20.7%
2	2710	Petroleum oils and oils obtained fr	13.2	17.1%	2	907	Cloves (whole fruit, cloves and ste	4.0	10.7%
3	1701	Cane or beet sugar and chemically p	7.1	9.2%	3	4407	Wood sawn or chipped lengthwise, sl	2.5	6.5%
4	3301	Essential oils (terpeneless or not)	4.2	5.4%	4	4819	Cartons, boxes, cases, bags and oth	2.2	5.7%
5	4407	Wood sawed or chipped lengthwise	4.2	5.4%	5	713	Dried leguminous vegetables, shelle	2.0	5.3%
6	5201	Cotton, not carded or combed.	2.5	3.3%	6	901	Coffee, whether or not roasted or d	1.5	4.1%
7	2106	Food preparations not elsewhere spe	2.3	3.0%	7	2501	Salt (including table salt and dena	1.3	3.5%
8	4819	Cartons, boxes, cases, bags and oth	1.9	2.5%	8	2713	Petroleum coke, petroleum bitumen a	1.1	3.0%
9	3102	Mineral or chemical fertilisers, ni	1.6	2.0%	9	306	Crustaceans, whether in shell or no	0.9	2.4%
10	1605	Crustaceans, molluscs and other	1.2	1.6%	10	307	Molluscs, whether in shell or not,	0.9	2.3%

Top 20 exports Madagascar to COMESA in 2019					Top 20 exports Madagascar to COMESA in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1 1	904	Pepper of the genus Piper; dried or	1.0	1.3%	1 1	904	Pepper of the genus Piper; dried or	0.8	2.2%
1 2	703	Onions, shallots, garlic, leeks and	1.0	1.3%	1 2	8429	Self-propelled bulldozers, angledoz	0.8	2.2%
1 3	713	Dried leguminous vegetables, shelled	1.0	1.2%	1 3	8704	Motor vehicles for transport	0.8	2.1%
1 4	8802	Other aircraft (for example, helicopter	0.9	1.2%	1 4	6110	Jerseys, pullovers, cardigans, wais	0.7	1.9%
1 5	2501	Salt (including table salt	0.9	1.2%	1 5	4818	Toilet paper and similar paper,	0.7	1.8%
1 6	307	Molluscs, whether in shell or not,	0.9	1.1%	1 6	9999	Commodities not specified according	0.5	1.2%
1 7	306	Crustaceans, whether in shell	0.8	1.1%	1 7	3923	Articles for the conveyance or pack	0.5	1.2%
1 8	2711	Petroleum gases and other gaseous h	0.7	0.9%	1 8	5201	Cotton, not carded or combed.	0.4	1.2%
1 9	7308	Structures (excluding prefabricated	0.6	0.8%	1 9	2711	Petroleum gases and other gases	0.4	1.2%
2 0	304	Fish fillets and other fish meat	0.6	0.8%	2 0	2106	Food preparations not elsewhere	0.4	1.0%
		Total goods exports	77.3	100.0%			Total goods exports	37.8	100.0%
		Total of top 5 exports	50.5	65%			Total of top 5 exports	18.5	49%
		HHI top 5	0.3				HHI top 5	0.3	
		Total of top 10 exports	60.2	77.8%			Total of top 10 exports	24.3	64.2%
		HHI top 10	0.21				HHI top 10	0.17	
		Total of top 20 exports	68.6	88.7%			Total of top 20 exports	30.3	80.1%
		HHI top 20	0.16				HHI top 20	0.11	

Source: UN Comtrade data

Madagascar's goods imports from non-EU jurisdictions

Table 47: Top 20 imports Madagascar from WORLD ex EU27

Top 20 imports Madagascar from WORLD ex EU27 in 2019					Top 20 imports Madagascar from WORLD ex EU27 in 2016				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	2710	Petroleum oils and oils obtained fr	560.1	20.4%	1		Petroleum oils and oils	438.0	17.6%
2	1006	Rice.	128.5	4.7%	2		Rice.	90.2	3.6%
3	2503	Wheat or meslin flour.	72.7	2.6%	3		Sulphur of all kinds,	61.5	2.5%
4	1511	Palm oil and its fractions, whether	61.7	2.2%	4		Palm oil and its fractions, whether	58.9	2.4%
5	5208	Wool and fine or coarse animal hair	58.8	2.1%	5		Wool and fine or coarse animal hair	53.8	2.2%
6	5105	Other knitted or crocheted fabrics.	56.0	2.0%	6		Medicaments (excluding goods of health	51.6	2.1%
7	1701	Cane or beet sugar and chemically p	53.4	1.9%	7		Motor vehicles for the transport of	50.6	2.0%
8	3004	Medicaments (excluding goods of health	52.0	1.9%	8		Wheat or meslin flour.	50.2	2.0%
9	8704	Motor vehicles for the transport of	49.2	1.8%	9		Motor cars and other motor vehicles	49.6	2.0%
10	1101	Worn clothing and other worn articles	48.4	1.8%	10		Woven fabrics of cotton, containing	49.1	2.0%
11	2523	Sulphur of all kinds,	47.4	1.7%	11		Cane or beet sugar and chemically	46.0	1.9%
12	8703	Motor cars and other motor vehicles	44.7	1.6%	12		Portland cement, aluminous cement,	45.0	1.8%
13	6309	Portland cement, aluminous cement,	43.3	1.6%	13		Other knitted or crocheted fabrics.	33.0	1.3%
14	3002	Coal; briquettes, ovoids and simila	38.5	1.4%	14		Flat-rolled products of iron or non iron	29.5	1.2%
15	6006	Woven fabrics of cotton, containing	34.4	1.3%	15		Human blood; animal blood prepared	29.4	1.2%
16	5007	Flat-rolled products of iron or non	34.1	1.2%	16		Woven fabrics of silk	28.4	1.1%

Top 20 imports Madagascar from WORLD ex EU27 in 2019					Top 20 imports Madagascar from WORLD ex EU27 in 2016				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
17	1507	Soya-bean oil and its fractions, wh	29.2	1.1%	17		Worn clothing and other worn articles	27.4	1.1%
18	2701	Woven fabrics of cotton, containing	24.3	0.9%	18		Coal; briquettes, ovoids and simila	24.4	1.0%
19	2207	Other bars and rods of iron or non-iron	23.6	0.9%	19		Soya-bean oil and its fractions,	23.8	1.0%
20	8413	Woven fabrics of synthetic filament	22.7	0.8%	20		Telephone sets, including telephone	23.7	1.0%
		Total goods exports	2749.0	100.0%			Total goods exports	2485.0	100.0%
		Total of top 5 exports	881.9	32%			Total of top 5 exports	702.4	28.3%
		HHI top 5	0.4				HHI top 5	0.4	
		Total of top 10 exports	1140.9	41.5%			Total of top 10 exports	953.5	38.4%
		HHI top 10	0.27				HHI top 10	0.24	
		Total of top 20 exports	1483.1	54.0%			Total of top 20 exports	1264.0	50.9%
		HHI top 20	0.17				HHI top 20	0.15	

Source: UN Comtrade data

Table 48: Top 20 imports Madagascar from EAC

Top 20 imports Madagascar from EAC in 2019					Top 20 imports Madagascar from EAC in 2016				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	7010	Carboys, bottles, flasks, jars, pot	5.6	32.3%	1	7010	Carboys, bottles, flasks, jars, pot	0.7	21.2%
2	2711	Petroleum gases and other gases	4.3	24.7%	2	3923	Articles for the conveyance or pack	0.4	12.6%
3	2710	Petroleum oils and oils obtained	2.8	16.1%	3	3924	Tableware, kitchenware, other house	0.2	7.0%
4	901	Coffee, whether or not roasted or d	1.3	7.4%	4	3401	Soap; organic surface-active products	0.2	5.6%

Top 20 imports Madagascar from EAC in 2019					Top 20 imports Madagascar from EAC in 2016				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
5	2401	Unmanufactured tobacco; tobacco refined	0.6	3.7%	5	2401	Unmanufactured tobacco; tobacco refined	0.2	4.9%
6	3923	Articles for the conveyance or pack	0.6	3.4%	6	9999	Commodities not specified according	0.2	4.9%
7	2106	Food preparations	0.3	1.9%	7	4911	Other printed matter, including pri	0.1	3.6%
8	8517	Telephone sets, including telephone	0.2	1.2%	8	1517	Margarine; edible mixtures or prepared	0.1	3.5%
9	3401	Soap; organic surface-active produc	0.1	0.8%	9	7607	Aluminium foil (whether or not prin	0.1	3.3%
10	9405	Lamps and lighting fittings includi	0.1	0.6%	10	3402	Organic surface-active agents (othe	0.1	3.2%
11	8474	Machinery for sorting, screening, s	0.1	0.6%	11	9401	Seats (other than those of heading	0.1	3.1%
12	3402	Organic surface-active agents (othe	0.1	0.6%	12	5511	Yarn (other than sewing thread) of	0.1	2.5%
13	9603	Brooms, brushes (including brushes	0.1	0.5%	13	5407	Woven fabrics of synthetic filament	0.1	1.9%
14	3924	Tableware, kitchenware, other house	0.1	0.5%	14	1302	Vegetable saps and extracts; pectic	0.1	1.9%
15	8480	Moulding boxes for metal foundry; m	0.1	0.4%	15	9606	Buttons, press-fasteners, snap-fast	0.1	1.8%
16	9406	Prefabricated buildings.	0.1	0.4%	16	9018	Instruments and appliances	0.1	1.8%
17	713	Dried leguminous vegetables, shelled	0.1	0.4%	17	2710	Petroleum oils and oils obtained fr	0.1	1.5%
18	4911	Other printed matter,	0.1	0.4%	18	3305	Preparations for use on the hair.	0.1	1.5%
19	3004	Medicaments (excluding goods of health	0.1	0.3%	19	4106	Tanned or crust hides and skins	0.0	1.3%
20	9018	Instruments and appliances	0.1	0.3%	20	1704	Sugar confectionery	0.0	1.1%

Top 20 imports Madagascar from EAC in 2019					Top 20 imports Madagascar from EAC in 2016				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
		Total goods exports	17.5	100.0%			Total goods exports	3.4	100.0%
		Total of top 5 exports	14.7	84%			Total of top 5 exports	1.7	51%
		HHI top 5	0.3				HHI top 5	0.3	
		Total of top 10 exports	16.1	92.1%			Total of top 10 exports	2.4	69.8%
		HHI top 10	0.24				HHI top 10	0.16	
		Total of top 20 exports	16.8	96.5%			Total of top 20 exports	3.0	88.1%
		HHI top 20	0.21				HHI top 20	0.11	

Source: UN Comtrade data

Table 49: Top 20 imports Madagascar from SADC

Top 20 imports Madagascar from SADC in 2019					Top 20 imports Madagascar from SADC in 2016				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	2701	Coal; briquettes, ovoids and simila	38.5	9.5%	1	2701	Coal; briquettes, ovoids and simila	24.3	8.9%
2	2207	Undenatured ethyl alcohol of an alc	22.1	5.5%	2	2207	Undenatured ethyl alcohol of an alc	19.8	7.3%
3	6006	Other knitted or crocheted fabrics.	18.8	4.6%	3	2710	Petroleum oils and oils	17.2	6.3%
4	5208	Woven fabrics of cotton, containing	18.2	4.5%	4	8704	Motor vehicles for the transport	15.0	5.5%
5	1701	Cane or beet sugar	17.5	4.3%	5	5208	Woven fabrics of cotton, containing	14.6	5.4%
6	303	Fish, frozen, excluding fish fillet	16.1	4.0%	6	3923	Articles for the conveyance or pack	11.5	4.2%
7	2710	Petroleum oils and oils obtained fr	14.1	3.5%	7	303	Fish, frozen, excluding fish fillet	10.8	4.0%

Top 20 imports Madagascar from SADC in 2019					Top 20 imports Madagascar from SADC in 2016				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
8	3923	Articles for the conveyance or pack	13.1	3.2%	8	6006	Other knitted or crocheted fabrics.	9.6	3.5%
9	8704	Motor vehicles the transport	12.3	3.0%	9	6002	Knitted or crocheted fabrics of a w	7.7	2.8%
10	3004	Medicaments (excluding goods of health	11.3	2.8%	10	1902	Pasta, whether or not cooke	7.5	2.7%
11	5106	Yarn of carded wool, not put up for	8.4	2.1%	11	3902	Polymers of propylene	7.0	2.6%
12	3302	Mixtures of odoriferous substances	7.9	1.9%	12	1701	Cane or beet sugar and chemically	6.9	2.5%
13	6001	Pile fabrics, including long pile	6.9	1.7%	13	3302	Mixtures of odoriferous substances	6.9	2.5%
14	3902	Polymers of propylene	5.9	1.5%	14	5106	Yarn of carded wool,	6.6	2.4%
15	7010	Carboys, bottles, flasks, jars, pot	5.4	1.3%	15	6001	Pile fabrics,	6.3	2.3%
16	8413	Pumps for liquids,	5.0	1.2%	16	2309	Preparations of a kind used in anim	5.2	1.9%
17	2711	Petroleum gases and other gaseous h	4.9	1.2%	17	3906	Acrylic polymers in primary forms.	4.8	1.8%
18	4805	Other uncoated paper and paperboard	4.4	1.1%	18	1005	Maize (corn).	4.1	1.5%
19	1902	Pasta,	3.8	0.9%	19	4805	Other uncoated paper and paperboard	3.8	1.4%
20	8481	Taps, cocks, valves and similar app	3.8	0.9%	20	4819	Cartons, boxes, cases, bags and others	2.9	1.0%
		Total goods exports	405.2	100.0%			Total goods exports	272.7	100.0%
		Total of top 5 exports	115.1	28%			Total of top 5 exports	91.0	33%
		HHI top 5	0.2				HHI top 5	0.2	
		Total of top 10 exports	182.0	44.9%			Total of top 10 exports	138.1	50.7%

Top 20 imports Madagascar from SADC in 2019					Top 20 imports Madagascar from SADC in 2016				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
		HHI top 10	0.12				HHI top 10	0.11	
		Total of top 20 exports	238.4	58.8%			Total of top 20 exports	192.6	70.6%
		HHI top 20	0.07				HHI top 20	0.07	

Source: UN Comtrade data

Table 50: Top 20 imports Madagascar from COMESA

Top 20 imports Madagascar from COMESA in 2019					Top 20 imports Madagascar from COMESA in 2016				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	1101	Wheat or meslin flour.	42.2	14.7%	1	1101	Wheat or meslin flour.	20.4	11.5%
2	6006	Other knitted or crocheted fabrics.	18.8	6.5%	2	1902	Pasta, whether or not cooked or stu	17.3	9.7%
3	5208	Woven fabrics of cotton, containing	18.2	6.3%	3	5208	Woven fabrics of cotton, containing	14.6	8.2%
4	303	Fish, frozen, excluding fish fillet	16.1	5.6%	4	303	Fish, frozen, excluding fish fillet	10.8	6.1%
5	1902	Pasta, whether or not cooked	14.5	5.1%	5	6006	Other knitted or crocheted fabrics.	9.7	5.4%
6	3923	Articles for the conveyance or pack	12.3	4.3%	6	3923	Articles for the conveyance or pack	9.5	5.4%
7	3004	Medicaments (excluding goods of health	10.2	3.5%	7	6002	Knitted or crocheted fabrics of wool	7.7	4.3%
8	1507	Soya-bean oil and its fractions	8.7	3.0%	8	5106	Yarn of carded wool, not put up for	6.6	3.7%
9	2710	Petroleum oils and oils obtained	8.6	3.0%	9	3302	Mixtures of odoriferous substances	6.5	3.6%
10	5106	Yarn of carded wool, not put up for	8.4	2.9%	10	6001	Pile fabrics, including long pile	6.3	3.6%
11	2207	Undenatured ethyl alcohol of an alc	7.8	2.7%	11	1507	Soya-bean oil and its fractions,	5.2	2.9%

Top 20 imports Madagascar from COMESA in 2019					Top 20 imports Madagascar from COMESA in 2016				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1 2	6001	Pile fabrics, including long pile f	6.9	2.4%	1 2	2207	Undenatured ethyl alcohol of an alc	4.8	2.7%
1 3	4818	Toilet paper and similar paper, cel	4.5	1.6%	1 3	2309	Preparations of a kind used in anim	4.8	2.7%
1 4	7317	Nails, tacks, drawing pins,	3.7	1.3%	1 4	1701	Cane or beet sugar and chemically	4.4	2.5%
1 5	2523	Portland cement, aluminous cement,	3.1	1.1%	1 5	406	Cheese and curd.	2.9	1.6%
1 6	8452	Sewing machines, other than book-se	3.0	1.1%	1 6	5205	Cotton yarn (other than sewing thre	2.4	1.4%
1 7	1701	Cane or beet sugar and chemically	3.0	1.0%	1 7	3824	Prepared binders for foundry moulds	2.0	1.1%
1 8	8517	Telephone sets, including telephone	2.9	1.0%	1 8	3209	Paints and varnishes (including ena	1.9	1.1%
1 9	5401	Sewing thread of man-made filaments	2.9	1.0%	1 9	4818	Toilet paper and similar paper, cel	1.5	0.9%
2 0	2304	Oil-cake and other solid residues,	2.8	1.0%	2 0	9607	Slide fasteners and parts thereof.	1.5	0.8%
		Total goods exports	287.5	100.0%			Total goods exports	177.6	100.0%
		Total of top 5 exports	109.7	38%			Total of top 5 exports	72.8	41%
		HHI top 5	0.2				HHI top 5	0.2	
		Total of top 10 exports	157.9	54.9%			Total of top 10 exports	109.3	61.6%
		HHI top 10	0.14				HHI top 10	0.12	
		Total of top 20 exports	198.4	69.0%			Total of top 20 exports	140.7	79.2%
		HHI top 20	0.09				HHI top 20	0.08	

Source: UN Comtrade data

Mauritius**Mauritius' goods exports to the EU****Table 51: Top 20 exports, Mauritius to EU27, 2009, 2012, 2019 (Eurostat data), trade value in million EUR, HS 2, sorted by 2019 trade value**

	2009	2012	2019	CAGR 2009 - 2012	CAGR 2012 - 2019
Total	515.2	748.6	612.8	13.3%	-2.8%
PREPARATIONS OF MEAT, OF FISH OR OF CRUSTACEANS, MOLLUSCS OR OTHER AQUATIC INVERTEBRATES (1988-2500)	82.8	172.1	165.8	27.6%	-0.5%
SUGARS AND SUGAR CONFECTIONERY (1988-2500)	72.2	204.7	99.3	41.5%	-9.8%
ARTICLES OF APPAREL AND CLOTHING ACCESSORIES, KNITTED OR CROCHETED (1988-2500)	145.6	97.8	74.9	- 12.4%	-3.7%
ARTICLES OF APPAREL AND CLOTHING ACCESSORIES, NOT KNITTED OR CROCHETED (1988-2500)	68.8	47.4	60.3	- 11.7%	3.5%
NATURAL OR CULTURED PEARLS, PRECIOUS OR SEMI-PRECIOUS STONES, PRECIOUS METALS, METALS CLAD WITH PRECIOUS METAL, AND ARTICLES THEREOF; IMITATION JEWELLERY; COIN (1988-2500)	23.4	69.2	31.3	43.6%	- 10.7%
FISH AND CRUSTACEANS, MOLLUSCS AND OTHER AQUATIC INVERTEBRATES (1988-2500)	4.1	14.2	28.3	51.7%	10.3%
OPTICAL, PHOTOGRAPHIC, CINEMATOGRAPHIC, MEASURING, CHECKING, PRECISION, MEDICAL OR SURGICAL INSTRUMENTS AND APPARATUS; PARTS AND ACCESSORIES THEREOF (1988-2500)	12.5	21.4	21.7	19.6%	0.2%
CLOCKS AND WATCHES AND PARTS THEREOF (1988-2500)	4.8	12.9	16.8	38.7%	3.9%
AIRCRAFT, SPACECRAFT, AND PARTS THEREOF (1988-2500)	0.6	0.3	9.7	- 18.3%	63.2%
LIVE ANIMALS (1988-2500)	10.6	7.3	9.4	- 11.8%	3.7%
ARTICLES OF LEATHER; SADDLERY AND HARNESS; TRAVEL GOODS, HANDBAGS AND SIMILAR CONTAINERS; ARTICLES OF ANIMAL GUT (OTHER THAN SILKWORM GUT) (1988-2500)	6.8	13.5	9.0	25.4%	-5.6%
EDIBLE FRUIT AND NUTS; PEEL OF CITRUS FRUIT OR MELONS (1988-2500)	2.0	4.6	8.9	31.6%	9.7%
MISCELLANEOUS MANUFACTURED ARTICLES (1988-2500)	2.1	5.1	6.0	34.3%	2.6%
PLASTICS AND ARTICLES THEREOF (1988-2500)	3.2	5.1	5.4	16.2%	0.9%
BEVERAGES, SPIRITS AND VINEGAR (1988-2500)	3.5	5.9	5.1	18.9%	-2.2%
ELECTRICAL MACHINERY AND EQUIPMENT AND PARTS THEREOF; SOUND RECORDERS AND REPRODUCERS, TELEVISION IMAGE AND SOUND RECORDERS AND REPRODUCERS, AND PARTS AND ACCESSORIES OF SUCH ARTICLES (1988-2500)	4.7	5.0	4.5	1.9%	-1.5%

	2009	2012	2019	CAGR 2009 - 2012	CAGR 2012 - 2019
NUCLEAR REACTORS, BOILERS, MACHINERY AND MECHANICAL APPLIANCES; PARTS THEREOF (1988-2500)	2.6	6.9	4.0	39.1%	-7.4%
ALUMINIUM AND ARTICLES THEREOF (1988-2500)	5.1	3.3	3.5	- 13.1%	0.8%
ESSENTIAL OILS AND RESINOIDS; PERFUMERY, COSMETIC OR TOILET PREPARATIONS (1988-2500)	6.2	7.2	3.5	5.3%	-9.8%
COFFEE, TEA, MATE AND SPICES (1988-2500)	0.8	1.0	3.1	7.4%	17.1%
Share top 5 imports	76%	79%	70%		
Share top 10 imports	83%	86%	84%		
Share top 20 imports	90%	94%	93%		

Source: Eurostat

Table 52: Top 20 exports, Mauritius to EU27, 2009, 2012, 2019 (UN Comtrade data), trade value in million USD, HS 4, sorted by 2019 trade value.

2019					2012				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
1	1604	Prepared or preserved fish; caviar	243.9	28.1%	1604	Prepared or preserved fish; caviar	334.6	28.2%	6109	T-shirts, singlets and other vests,	278.5	22.8%
2	1701	Cane or beet sugar and chemically p	128.2	14.8%	1701	Cane or beet sugar and chemically p	239.5	20.2%	1604	Prepared or preserved fish; caviar	212.8	17.4%
3	6109	T-shirts, singlets and other vests,	70.7	8.2%	6109	T-shirts, singlets and other vests,	173.8	14.6%	1701	Cane or beet sugar and chemically	210.6	17.2%
4	6203	Men's or boys' suits, ensembles, ja	36.2	4.2%	6110	Jerseys, pullovers, cardigans	66.8	5.6%	6110	Jerseys, pullovers, cardigans,	50.5	4.1%
5	6104	Women's or girls' suits, ensembles,	26.0	3.0%	7113	Articles of jewellery and parts the	47.5	4.0%	6203	Men's or boys' suits, ensembles,	50.1	4.1%
6	6110	Jerseys, pullovers, cardigans, wais	25.2	2.9%	6104	Women's or girls' suits, ensembles,	42.8	3.6%	6105	Men's or boys' shirts, knitted or c	35.1	2.9%
7	6205	Men's or boys' shirts.	23.7	2.7%	6203	Men's or boys' suits, ensembles,	41.2	3.5%	6205	Men's or boys' shirts.	31.1	2.5%

	2019				2012				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
8	6204	Women's or girls' suits, ensembles,	22.3	2.6%	6105	Men's or boys' shirts, knitted or c	26.9	2.3%	6104	Women's or girls' suits, ensembles,	28.7	2.4%
9	9018	Instruments and appliances used in	19.5	2.2%	7102	Diamonds, whether or not worked, bu	21.7	1.8%	7113	Articles of jewellery and parts the	26.8	2.2%
10	303	Fish, frozen, excluding fish fillet	13.1	1.5%	6106	Women's or girls' blouses, shirts a	17.6	1.5%	303	Fish, frozen, excluding fish fillet	23.4	1.9%
11	6105	Men's or boys' shirts, knitted or c	13.1	1.5%	6204	Women's or girls' suits, ensembles,	12.2	1.0%	106	Other live animals.	14.4	1.2%
12	7102	Diamonds, whether or not worked, bu	12.9	1.5%	4202	Trunks, suit-cases, vanity-cases, e	11.4	1.0%	7102	Diamonds, whether or not worked,	13.0	1.1%
13	6114	Other garments, knitted or crochet	11.6	1.3%	9018	Instruments and appliances used in	10.6	0.9%	6206	Women's or girls' blouses, shirts a	12.5	1.0%
14	3004	Medicaments (excluding goods of hea	11.4	1.3%	9021	Orthopaedic appliances, including c	10.3	0.9%	6204	Women's or girls' suits, ensembles,	12.5	1.0%
15	9113	Watch straps, watch bands and watch	10.3	1.2%	1703	Molasses resulting from the extract	9.3	0.8%	6106	Women's or girls' blouses, shirts a	10.3	0.8%
16	106	Other live animals.	10.0	1.2%	106	Other live animals.	9.1	0.8%	9018	Instruments and appliances used in	10.1	0.8%
17	304	Fish fillets and other fish meat (w	9.1	1.1%	7117	Imitation jewellery.	6.9	0.6%	4202	Trunks, suit-cases, vanity-cases,	9.4	0.8%
18	2711	Petroleum gases and other gaseous h	9.1	1.1%	5106	Yarn of carded wool,	6.9	0.6%	1703	Molasses resulting from the extract	9.1	0.7%
19	5106	Yarn of carded wool, not put up for	8.4	1.0%	4203	Articles of apparel and clothing	5.9	0.5%	3105	Mineral or chemical fertilisers	9.0	0.7%
20	4202	Trunks, suit-cases, vanity-cases, e	7.5	0.9%	6108	Women's or girls' slips, petticoats	5.9	0.5%	3304	Beauty or make-up preparation	9.0	0.7%
		Total goods exports	866.6	100.0%		Total goods exports	1187.1	100.0%		Total goods exports	1220.9	100.0%
		Total of top 5 exports	505.1	58%			862.2	73%			802.5	66%
		HHI top 5	0.3				0.3				0.3	

2019					2012				2009			
Product code	Description	Trade value in million USD	Share in total trade		Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
	Total of top 10 exports	608.9	70%				1012.4	85%			947.5	78%
	HHI top 10	0.23					0.21				0.20	
	Total of top 20 exports	712.5	82.2%				1100.8	92.7%			1056.8	86.6%
	HHI top 20	0.17					0.18				0.16	

Source: UN Comtrade data

Table 53: Top 20 exports, Mauritius to EU27, compound annual growth rate (CAGR), 2012-2019, 2009-2012

	2019	2019	2019	2012	2009	Post tariff elimination	Pre tariff elimination
	Product code	Description	Trade value in million USD	Trade value in million USD	Trade value in million USD	CAGR 2012 - 2019	CAGR 2009 - 2012
1	1604	Prepared or preserved fish; caviar	243.9	334.6	212.8	-4.4%	16.3%
2	1701	Cane or beet sugar and chemically p	128.2	239.5	210.6	-8.5%	4.4%
3	6109	T-shirts, singlets and other vests,	70.7	173.8	278.5	-12.0%	-14.6%
4	6203	Men's or boys' suits, ensembles, ja	36.2	41.2	50.1	-1.8%	-6.3%
5	6104	Women's or girls' suits, ensembles,	26.0	42.8	28.7	-6.9%	14.2%
6	6110	Jerseys, pullovers, cardigans, wais	25.2	66.8	50.5	-13.0%	9.8%
7	6205	Men's or boys' shirts.	23.7	4.1	31.1	28.3%	-48.9%
8	6204	Women's or girls' suits, ensembles,	22.3	42.8	28.7	-8.9%	14.2%
9	9018	Instruments and appliances used in	19.5	10.6	10.1	9.1%	1.6%
10	303	Fish, frozen, excluding fish fillet	13.1	n/a	23.4	n/a	n/a
11	6105	Men's or boys' shirts, knitted or c	13.1	26.9	35.1	-9.8%	-8.5%
12	7102	Diamonds, whether or not worked, bu	12.9	21.7	13.0	-7.2%	18.5%

	2019	2019	2019	2012	2009	Post tariff elimination	Pre tariff elimination
	Product code	Description	Trade value in million USD	Trade value in million USD	Trade value in million USD	CAGR 2012 - 2019	CAGR 2009 - 2012
13	6114	Other garments, knitted or crochete	11.6	0.9	0.3	43.5%	38.6%
14	3004	Medicaments (excluding goods of hea	11.4	3.3	6.9	19.3%	-21.8%
15	9113	Watch straps, watch bands and watch	10.3	1.6	2.2	31.0%	-10.8%
16	106	Other live animals.	10.0	9.1	14.4	1.5%	-14.3%
17	304	Fish fillets and other fish meat (w	9.1	0.2	2.4	71.5%	-55.6%
18	2711	Petroleum gases and other gaseous h	9.1	n/a	n/a	n/a	n/a
19	5106	Yarn of carded wool, not put up for	8.4	6.9	2.5	3.0%	40.9%
20	4202	Trunks, suit-cases, vanity-cases, e	7.5	11.4	9.4	-5.8%	6.9%
		Total goods exports	866.6	1187.1	1220.9	-4.4%	-0.9%

Source: UN Comtrade data

Mauritius' goods imports from the EU

Table 54: Top 20 imports, Mauritius from EU27, 2009, 2012, 2019 (Eurostat data), trade value in million EUR, HS 2, sorted by 2019 trade value

	2009	2013	2019	CAGR 2009 - 2013	CAGR 2013 - 2019
Total	631.6	791.3	1223.4	5.8%	7.5%
AIRCRAFT, SPACECRAFT, AND PARTS THEREOF(1988-2500)	80.8	6.8	180.8	-46.2%	73.0%
NUCLEAR REACTORS, BOILERS, MACHINERY AND MECHANICAL APPLIANCES; PARTS THEREOF(1988-2500)	97.6	110.5	132.6	3.2%	3.1%
NATURAL OR CULTURED PEARLS, PRECIOUS OR SEMI-PRECIOUS STONES, PRECIOUS METALS, METALS CLAD WITH PRECIOUS METAL, AND ARTICLES THEREOF; IMITATION JEWELLERY; COIN(1988-2500)	61.3	96.1	98.0	11.9%	0.3%
VEHICLES OTHER THAN RAILWAY OR TRAMWAY ROLLING STOCK, AND PARTS AND ACCESSORIES THEREOF(1988-2500)	23.7	39.7	69.0	13.8%	9.6%
RAILWAY OR TRAMWAY LOCOMOTIVES, ROLLING STOCK AND PARTS THEREOF; RAILWAY OR TRAMWAY TRACK FIXTURES AND FITTINGS AND PARTS THEREOF; MECHANICAL (INCLUDING ELECTROMECHANICAL) TRAFFIC SIGNALLING EQUIPMENT OF ALL KINDS(1988-2500)	0.1	0.0	64.1	-28.1%	268.6 %
ELECTRICAL MACHINERY AND EQUIPMENT AND PARTS THEREOF; SOUND RECORDERS AND REPRODUCERS, TELEVISION IMAGE AND SOUND RECORDERS AND REPRODUCERS, AND PARTS AND ACCESSORIES OF SUCH ARTICLES(1988-2500)	50.7	55.5	62.6	2.3%	2.0%
FISH AND CRUSTACEANS, MOLLUSCS AND OTHER AQUATIC INVERTEBRATES(1988-2500)	45.4	99.8	50.5	21.8%	-10.7%
ESSENTIAL OILS AND RESINOIDS; PERFUMERY, COSMETIC OR TOILET PREPARATIONS(1988-2500)	22.9	26.9	44.2	4.1%	8.6%
PHARMACEUTICAL PRODUCTS(1988-2500)	18.5	23.2	39.1	5.7%	9.1%
CEREALS(1988-2500)	16.0	19.2	35.2	4.6%	10.7%
OPTICAL, PHOTOGRAPHIC, CINEMATOGRAPHIC, MEASURING, CHECKING, PRECISION, MEDICAL OR SURGICAL INSTRUMENTS AND APPARATUS; PARTS AND ACCESSORIES THEREOF(1988-2500)	16.2	25.0	35.0	11.5%	5.7%
PLASTICS AND ARTICLES THEREOF(1988-2500)	11.2	14.6	31.4	6.8%	13.6%
BEVERAGES, SPIRITS AND VINEGAR(1988-2500)	11.9	13.1	28.4	2.5%	13.7%
PREPARATIONS OF CEREALS, FLOUR, STARCH OR MILK; PASTRYCOOKS' PRODUCTS(1988-2500)	8.2	14.8	23.0	16.0%	7.6%
FURNITURE; BEDDING, MATTRESSES, MATTRESS SUPPORTS, CUSHIONS AND SIMILAR STUFFED FURNISHINGS; LAMPS AND LIGHTING FITTINGS, NOT ELSEWHERE SPECIFIED OR INCLUDED; ILLUMINATED SIGNS, ILLUMINATED NAMEPLATES AND THE LIKE; PREFABRICATED BUILDINGS(1988-2500)	5.2	13.8	19.5	27.8%	5.9%
DAIRY PRODUCE; BIRDS' EGGS; NATURAL HONEY; EDIBLE PRODUCTS OF ANIMAL ORIGIN, NOT ELSEWHERE SPECIFIED OR INCLUDED(1988-2500)	6.3	11.2	19.4	15.2%	9.6%
MISCELLANEOUS EDIBLE PREPARATIONS(1988-2500)	4.9	11.2	18.0	23.1%	8.2%
PREPARATIONS OF VEGETABLES, FRUIT, NUTS OR OTHER PARTS OF PLANTS(1988-2500)	4.8	7.8	14.8	12.8%	11.3%

	2009	2013	2019	CAGR 2009 - 2013	CAGR 2013 - 2019
ARTICLES OF IRON OR STEEL(1988-2500)	8.4	19.2	12.6	23.1%	-6.8%
CLOCKS AND WATCHES AND PARTS THEREOF(1988-2500)	3.1	10.6	12.5	36.1%	2.8%
Share top 5 exports	42%	32%	45%		
Share top 10 exports	66%	60%	63%		
Share top 20 exports	79%	78%	81%		

Source: Eurostat

Table 55: Top 20 imports, Mauritius from EU27, 2009, 2012, 2019 (UN Comtrade data), trade value in million USD, HS 4, sorted by 2019 trade value

	2019				2013				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
1	303	Fish, frozen, excluding fish fillet	95.1	7.2%	303	Fish, frozen, excluding fish fillet	221.0	18.4%	303	Fish, frozen, excluding fish fillet	123.2	12.5%
2	8703	Motor cars and other motor vehicles	81.7	6.2%	8703	Motor cars and other motor vehicles	59.4	4.9%	8802	Other aircraft (for example, helicopter	90.2	9.2%
3	7102	Diamonds, whether or not worked,	81.7	6.2%	3004	Medicaments (excluding goods of health	39.2	3.3%	3004	Medicaments (excluding goods of health	33.1	3.4%
4	3004	Medicaments (excluding goods of hea	58.6	4.4%	7113	Articles of jewellery and parts the	33.1	2.8%	8703	Motor cars and other motor vehicles	29.3	3.0%
5	1001	Wheat and meslin.	45.1	3.4%	1001	Wheat and meslin.	28.8	2.4%	1001	Wheat and meslin.	26.6	2.7%
6	8603	Self-propelled railway or tramway c	40.8	3.1%	3304	Beauty or make-up preparations and	22.9	1.9%	7102	Diamonds, whether or not worked,	25.1	2.5%
7	2711	Petroleum gases and other gaseous h	27.5	2.1%	7102	Diamonds, whether or not worked,	16.7	1.4%	8471	Automatic data processing machines	22.2	2.3%
8	3304	Beauty or make-up preparations and	17.7	1.3%	3303	Perfumes and toilet waters.	14.5	1.2%	7113	Articles of jewellery and parts the	21.4	2.2%
9	3303	Perfumes and toilet waters.	16.7	1.3%	7108	Gold (including gold plated with pl	13.8	1.1%	3304	Beauty or make-up preparations and	16.7	1.7%

	2019				2013				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
10	2309	Preparations of a kind used in anim	15.3	1.2%	2204	Wine of fresh grapes, including for	12.7	1.1%	8422	Dishwashing machines; machinery fo	10.2	1.0%
11	2106	Food preparations not elsewhere spe	14.6	1.1%	8471	Automatic data processing machines	12.5	1.0%	2204	Wine of fresh grapes, including for	9.1	0.9%
12	1905	Bread, pastry, cakes, biscuits and	13.9	1.0%	402	Milk and cream concentrated or con	12.0	1.0%	7108	Gold (including gold plated with pl	9.0	0.9%
13	8471	Automatic data processing machines	13.7	1.0%	7311	Containers for compressed or liquefy	11.3	0.9%	2106	Food preparations, not elsewhere	8.1	0.8%
14	1806	Chocolate and other food preparatio	13.6	1.0%	8451	Machinery (other than machines of h	10.9	0.9%	8536	Electrical apparatus for switching	8.0	0.8%
15	2208	Undenatured ethyl alcohol of an alc	13.4	1.0%	2106	Food preparations not elsewhere	10.5	0.9%	1901	Malt extract; food preparations of	7.5	0.8%
16	2204	Wine of fresh grapes, including for	12.0	0.9%	9114	Other clock or watch parts.	10.1	0.8%	8517	Electrical apparatus for line tele	7.4	0.8%
17	8536	Electrical apparatus for switching	10.9	0.8%	1806	Chocolate and other food preparation	10.0	0.8%	3303	Perfumes and toilet waters.	7.3	0.7%
18	6104	Women's or girls' suits, ensembles,	10.9	0.8%	8536	Electrical apparatus for switching	9.8	0.8%	8429	Self-propelled bulldozers, angledoz	7.3	0.7%
19	2202	Waters, including mineral waters an	10.8	0.8%	9403	Other furniture and parts thereof.	9.4	0.8%	8481	Taps, cocks, valves and similar app	6.9	0.7%
20	406	Cheese and curd.	10.8	0.8%	1901	Malt extract; food preparations of	9.2	0.8%	1806	Chocolate and other food preparation	6.9	0.7%
		Total goods imports from EU27	1327.5	100.0%		Total goods imports from EU27	1202.3	100.0%		Total goods imports from EU27	983.8	100.0%
		Total of top 5 exports	362.1	27%			381.6	32%			302.4	31%
		HHI top 5	0.2				0.4				0.3	
		Total of top 10 exports	480.2	36%			462.2	38%			398.0	40%
		HHI top 10	0.13				0.27				0.18	
		Total of top 20 exports	604.8	45.6%			568.0	47.2%			475.5	48.3%

2019				2013				2009			
Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
	HHI top 20	0.09				0.18				0.13	

Source: UN Comtrade data

Table 56: Top 20 imports, Mauritius from EU27, compound annual growth rate (CAGR), 2012-2019, 2009-2012

	2019	2019	2019	2013	2009	Post tariff elimination	Pre tariff elimination
	Product code	Description	Trade value in million USD	Trade value in million USD	Trade value in million USD	CAGR 2013 - 2019	CAGR 2009 - 2013
1	303	Fish, frozen, excluding fish fillet	95.1	221.0	123.2	-13.1%	15.7%
2	8703	Motor cars and other motor vehicles	81.7	59.4	29.3	5.4%	19.3%
3	7102	Diamonds, whether or not worked, bu	81.7	16.7	25.1	30.3%	-9.7%
4	3004	Medicaments (excluding goods of hea	58.6	39.2	33.1	6.9%	4.4%
5	1001	Wheat and meslin.	45.1	28.8	26.6	7.7%	2.0%
6	8603	Self-propelled railway or tramway c	40.8	n/a	n/a	n/a	n/a
7	2711	Petroleum gases and other gaseous h	27.5	0.0	0.0	411.6%	-50.2%
8	3304	Beauty or make-up preparations and	17.7	22.9	16.7	-4.2%	8.3%
9	3303	Perfumes and toilet waters.	16.7	14.5	7.3	2.5%	18.5%
10	2309	Preparations of a kind used in anim	15.3	3.1	2.1	30.5%	9.9%
11	2106	Food preparations not elsewhere spe	14.6	10.5	8.1	5.7%	6.8%
12	1905	Bread, pastry, cakes, biscuits and	13.9	6.5	3.4	13.6%	17.5%
13	8471	Automatic data processing machines	13.7	12.5	22.2	1.5%	-13.4%
14	1806	Chocolate and other food preparatio	13.6	10.0	6.9	5.3%	9.9%
15	2208	Undenatured ethyl alcohol of an alc	13.4	9.0	6.4	6.8%	8.9%

	2019	2019	2019	2013	2009	Post tariff elimination	Pre tariff elimination
	Product code	Description	Trade value in million USD	Trade value in million USD	Trade value in million USD	CAGR 2013 - 2019	CAGR 2009 - 2013
16	2204	Wine of fresh grapes, including for	12.0	12.7	9.1	-0.9%	8.6%
17	8536	Electrical apparatus for switching	10.9	9.8	8.0	1.7%	5.4%
18	6104	Women's or girls' suits, ensembles,	10.9	1.0	0.6	48.4%	13.3%
19	2202	Waters, including mineral waters an	10.8	6.2	3.2	9.7%	17.6%
20	406	Cheese and curd.	10.8	7.0	4.4	7.6%	12.1%
		Total goods imports from EU27	1327.5	1202.3	983.8	1.4%	6.9%

Source: UN Comtrade data

Mauritius goods exports to non-EU jurisdictions

Table 57: Top 20 exports Mauritius to WORLD ex EU27

Top 20 exports Mauritius to WORLD ex EU27 in 2019					Top 20 exports Mauritius to WORLD ex EU27 in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	6109	Men's or boys' shirts.	106.6	10.6%	1		Cane or beet sugar and chemically	183.9	27.6%
2	6110	Fish, frozen, excluding fish fillet	81.2	8.0%	2		T-shirts, singlets and other vests,	146.0	21.9%
3	7102	Diamonds, whether or not worked,	78.6	7.8%	3		Prepared or preserved fish; caviar	87.7	13.1%
4	6203	Men's or boys' suits, ensembles,	63.8	6.3%	4		Men's or boys' shirts.	86.6	13.0%
5	1701	Cane or beet sugar and chemically p	63.6	6.3%	5		Jerseys, pullovers, cardigans, wais	43.4	6.5%
6	6205	T-shirts, singlets and other vests,	46.0	4.6%	6		Men's or boys' suits, ensembles,	34.6	5.2%

Top 20 exports Mauritius to WORLD ex EU27 in 2019					Top 20 exports Mauritius to WORLD ex EU27 in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
7	106	Cotton yarn (other than sewing thread	33.0	3.3%	7		Articles of jewellery and parts the	20.5	3.1%
8	5106	Articles for the conveyance or pack	26.2	2.6%	8		Yarn of carded wool, not put up for	14.0	2.1%
9	2309	Other knitted or crocheted fabrics.	26.2	2.6%	9		Diamonds, whether or not worked,	13.5	2.0%
10	6105	Men's or boys' shirts, knitted	21.9	2.2%	10		Women's or girls' slips, petticoats	12.3	1.8%
11	6104	Women's or girls' suits, ensembles,	20.7	2.0%	11		Women's or girls' blouses, shirts	11.6	1.7%
12	9018	Medicaments (excluding goods of health	19.8	2.0%	12		Trunks, suit-cases, vanity-cases,	11.1	1.7%
13	2301	Woven fabrics of cotton, containing	17.4	1.7%	13		Molasses resulting from the extract	10.0	1.5%
14	6001	Animal products not elsewhere	17.0	1.7%	14		Pile fabrics, including long pile	9.5	1.4%
15	6106	Instruments and appliances used in	14.7	1.5%	15		Ferrous waste and scrap; remelting	9.1	1.4%
16	7113	Jerseys, pullovers, cardigans, wais	13.6	1.3%	16		Wheat or meslin flour.	8.7	1.3%
17	1703	Flours, meals and pellets, of meat	13.3	1.3%	17		Orthopaedic appliances, including	8.6	1.3%
18	6108	Other live animals.	12.5	1.2%	18		Women's or girls' suits, ensembles,	8.4	1.3%
19	9114	Vanilla.	11.9	1.2%	19		Instruments and appliances used in	8.3	1.2%
20	6212	Pile fabrics, including long pile f	11.3	1.1%	20		Other knitted or crocheted fabrics.	8.0	1.2%

Top 20 exports Mauritius to WORLD ex EU27 in 2019					Top 20 exports Mauritius to WORLD ex EU27 in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
		Total goods exports	1009.7	100.0%			Total goods exports	667.4	100.0%
		Total of top 5 exports	393.8	39%			Total of top 5 exports	547.6	82.1%
		HHI top 5	0.2				HHI top 5	0.2	
		Total of top 10 exports	547.1	54.2%			Total of top 10 exports	818.8	100.0%
		HHI top 10	0.12				HHI top 10	547.6	66.9%
		Total of top 20 exports	699.4	69.3%			Total of top 20 exports	0.2	
		HHI top 20	0.08				HHI top 20	642.5	78.5%

Source: UN Comtrade data

Table 58: Top 20 exports Mauritius to EAC

Top 20 exports Mauritius to EAC in 2019					Top 20 exports Mauritius to EAC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	1701	Cane or beet sugar and chemically	39.0	65.8%	1	7306	Other tubes, pipes and hollow profi	5.3	33.5%
2	8528	Reception apparatus for television,	6.3	10.6%	2	2401	Unmanufactured tobacco; tobacco refined	2.3	14.4%
3	2207	Undenatured ethyl alcohol of an alc	5.1	8.5%	3	4818	Toilet paper and similar paper,	1.9	12.1%
4	2711	Petroleum gases and other gases	4.0	6.8%	4	2202	Waters, including mineral waters an	0.9	6.0%
5	4911	Other printed matter,	1.0	1.7%	5	1701	Cane or beet sugar and chemically	0.9	5.4%
6	3923	Articles for the conveyance or pack	0.7	1.2%	6	2207	Undenatured ethyl alcohol of an alc	0.9	5.4%

Top 20 exports Mauritius to EAC in 2019					Top 20 exports Mauritius to EAC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
7	2309	Preparations of a kind used in anim	0.5	0.9%	7	4911	Other printed matter,	0.6	3.6%
8	8479	Machines and mechanical appliances	0.4	0.6%	8	3926	Other articles of plastics and articles	0.4	2.8%
9	6001	Pile fabrics, including long pile	0.4	0.6%	9	4819	Cartons, boxes, cases, bags and others	0.3	1.7%
10	3921	Other plates, sheets, film, foil an	0.2	0.3%	10	105	Live poultry, that is to say, fowls	0.3	1.6%
11	4821	Paper or paperboard labels	0.2	0.3%	11	4901	Printed books, brochures, leaflets	0.2	1.2%
12	6203	Men's or boys' suits, ensembles,	0.1	0.2%	12	7314	Cloth (including endless bands)	0.2	1.2%
13	8429	Self-propelled bulldozers, angledoz	0.1	0.2%	13	7317	Nails, tacks, drawing pins, corruga	0.2	1.1%
14	8703	Motor cars and other motor vehicles	0.1	0.2%	14	2309	Preparations of a kind used in anim	0.2	1.0%
15	1902	Pasta, whether or not cooked or stu	0.1	0.2%	15	5209	Woven fabrics of cotton, containing	0.1	0.8%
16	8421	Centrifuges, including centrifugal	0.1	0.2%	16	6109	T-shirts, singlets and other vests,	0.1	0.7%
17	6109	T-shirts, singlets and other vests,	0.1	0.1%	17	2301	Flours, meals and pellets, of meat	0.1	0.6%
18	8451	Machinery (other than machines	0.1	0.1%	18	6209	Babies' garments and clothing acces	0.1	0.5%
19	8448	Auxiliary machinery for use	0.1	0.1%	19	1516	Animal or vegetable fats and oils	0.1	0.5%
20	8473	Parts and accessories	0.1	0.1%	20	1902	Pasta, whether or not cooked or	0.1	0.5%
		Total goods exports	59.3	100.0%			Total goods exports	15.8	100.0%
		Total of top 5 exports	55.4	93%			Total of top 5 exports	11.3	71%
		HHI top 5	0.5				HHI top 5	0.3	

Top 20 exports Mauritius to EAC in 2019					Top 20 exports Mauritius to EAC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
		Total of top 10 exports	57.6	97.0%			Total of top 10 exports	13.6	86.5%
		HHI top 10	0.48				HHI top 10	0.21	
		Total of top 20 exports	58.6	98.7%			Total of top 20 exports	14.9	94.6%
		HHI top 20	0.47				HHI top 20	0.18	

Source: UN Comtrade data

Table 59: Top 20 exports Mauritius to SADC

Top 20 exports Mauritius to SADC in 2019					Top 20 exports Mauritius to SADC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	6203	Men's or boys' suits, ensembles,	46.3	12.3%	1	6109	T-shirts, singlets and other vests,	70.2	23.7%
2	6109	T-shirts, singlets and other vests,	33.0	8.8%	2	6203	Men's or boys' suits, ensembles	56.6	19.1%
3	6006	Other knitted or crocheted fabrics.	26.0	6.9%	3	2309	Preparations of a kind used in anim	13.4	4.5%
4	3923	Articles for the conveyance or pack	23.0	6.1%	4	6105	Men's or boys' shirts, knitted	11.9	4.0%
5	6105	Men's or boys' shirts, knitted or c	17.7	4.7%	5	6204	Women's or girls' suits, ensembles,	10.9	3.7%
6	5208	Woven fabrics of cotton, containing	16.9	4.5%	6	6104	Women's or girls' suits, ensembles,	10.5	3.5%
7	5205	Cotton yarn (other than sewing thread	16.6	4.4%	7	6001	Pile fabrics, including long pile	8.9	3.0%
8	6204	Women's or girls' suits, ensembles,	14.4	3.8%	8	6006	Other knitted or crocheted fabrics.	8.6	2.9%
9	6205	Men's or boys' shirts.	10.7	2.9%	9	6110	Jerseys, pullovers, cardigans, wais	8.3	2.8%

Top 20 exports Mauritius to SADC in 2019					Top 20 exports Mauritius to SADC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
10	6001	Pile fabrics, including long pile	8.9	2.4%	10	6205	Men's or boys' shirts.	8.2	2.8%
11	6110	Jerseys, pullovers, cardigans, wais	8.8	2.3%	11	5106	Yarn of carded wool, not put up for	7.2	2.4%
12	5106	Yarn of carded wool, not put up for	8.0	2.1%	12	1101	Wheat or meslin flour.	6.9	2.3%
13	2207	Undenatured ethyl alcohol of an alc	6.9	1.8%	13	6108	Women's or girls' slips, petticoats	5.9	2.0%
14	6104	Women's or girls' suits, ensembles,	6.0	1.6%	14	5205	Cotton yarn (other than sewing thread	5.5	1.9%
15	1701	Cane or beet sugar and chemically p	5.7	1.5%	15	5209	Woven fabrics of cotton, containing	4.9	1.6%
16	3921	Other plates, sheets, film, foil an	5.4	1.4%	16	1902	Pasta, whether or not cooked or stu	4.2	1.4%
17	1902	Pasta, whether or not cooked	5.3	1.4%	17	5208	Woven fabrics of cotton, containing	4.0	1.3%
18	2309	Preparations of a kind used in anim	4.8	1.3%	18	6004	Knitted or crocheted fabric	3.6	1.2%
19	8525	Transmission apparatus for radio-te	3.5	0.9%	19	4819	Cartons, boxes, cases, bags and others	3.5	1.2%
20	8528	Reception apparatus for television,	3.3	0.9%	20	2207	Undenatured ethyl alcohol of an alc	3.0	1.0%
		Total goods exports	376.3	100.0%			Total goods exports	296.6	100.0%
		Total of top 5 exports	146.0	39%			Total of top 5 exports	162.9	55%
		HHI top 5	0.2				HHI top 5	0.3	
		Total of top 10 exports	213.6	56.8%			Total of top 10 exports	207.4	69.9%
		HHI top 10	0.13				HHI top 10	0.21	
		Total of top 20 exports	271.2	72.1%			Total of top 20 exports	256.0	86.3%
		HHI top 20	0.08				HHI top 20	0.14	

Source: UN Comtrade data

Table 60: Top 20 exports Mauritius to COMESA

Top 20 exports Mauritius to COMESA in 2019					Top 20 exports Mauritius to COMESA in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	1701	Cane or beet sugar and chemically p	40.8	17.4%	1	2309	Preparations of a kind used in animals	13.3	12.8%
2	6006	Other knitted or crocheted fabrics.	18.9	8.1%	2	1101	Wheat or meslin flour.	8.2	7.9%
3	5208	Woven fabrics of cotton, containing	15.5	6.6%	3	6001	Pile fabrics, including long pile	7.8	7.5%
4	3923	Articles for the conveyance or pack	15.2	6.5%	4	5106	Yarn of carded wool, not put up for	7.2	6.9%
5	2207	Undenatured ethyl alcohol of an alc	11.4	4.9%	5	7306	Other tubes, pipes and hollow profi	7.0	6.7%
6	6001	Pile fabrics, including long pile	9.1	3.9%	6	1902	Pasta, whether or not cooked or stu	4.2	4.1%
7	5106	Yarn of carded wool, not put up for	8.0	3.4%	7	4819	Cartons, boxes, cases, bags and oth	3.8	3.6%
8	8528	Reception apparatus for television,	7.7	3.3%	8	5208	Woven fabrics of cotton, containing	3.2	3.1%
9	5205	Cotton yarn (other than sewing thread	6.7	2.9%	9	2207	Undenatured ethyl alcohol of an alc	3.2	3.0%
10	2711	Petroleum gases and other gaseous h	6.3	2.7%	10	5205	Cotton yarn (other than sewing thread	3.0	2.8%
11	2309	Preparations of a kind used in anim	6.1	2.6%	11	6003	Knitted or crocheted fabrics	2.4	2.3%
12	1902	Pasta, whether or not cooked	3.7	1.6%	12	4818	Toilet paper and similar paper, cel	2.3	2.2%
13	8525	Transmission apparatus for radio-te	3.4	1.5%	13	2401	Unmanufactured tobacco; tobacco refined	2.3	2.2%
14	8517	Electrical apparatus for line telep	3.1	1.3%	14	2301	Flours, meals and pellets, of meat	2.0	1.9%
15	2304	Oil-cake and other solid residues,	3.0	1.3%	15	5509	Yarn (other than sewing thread) of	2.0	1.9%
16	1604	Prepared or preserved fish; caviar	2.9	1.2%	16	5808	Braids in the piece; ornamental tri	2.0	1.9%
17	3401	Soap; organic surface-active produc	2.9	1.2%	17	5209	Woven fabrics of cotton, containing	1.9	1.8%
18	4819	Cartons, boxes, cases, bags and oth	2.4	1.0%	18	105	Live poultry, that is to say, fowls	1.5	1.5%
19	1101	Wheat or meslin flour.	2.3	1.0%	19	5107	Yarn of combed wool, not put up for	1.3	1.3%
20	3004	Medicaments (excluding goods of hea	2.3	1.0%	20	1701	Cane or beet sugar and chemically p	1.2	1.1%
		Total goods exports	234.8	100.0%			Total goods exports	104.1	100.0%
		Total of top 5 exports	101.9	43%			Total of top 5 exports	43.4	42%
		HHI top 5	0.3				HHI top 5	0.2	

Top 20 exports Mauritius to COMESA in 2019					Top 20 exports Mauritius to COMESA in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
		Total of top 10 exports	139.7	59.5%			Total of top 10 exports	60.8	58.4%
		HHI top 10	0.15				HHI top 10	0.13	
		Total of top 20 exports	172.0	73.3%			Total of top 20 exports	79.8	76.6%
		HHI top 20	0.10				HHI top 20	0.08	

Source: UN Comtrade data

Mauritius goods imports from non-EU jurisdictions

Table 61: Top 20 imports Mauritius from WORLD ex EU27

Top 20 imports Mauritius from WORLD ex EU27 in 2019					Top 20 imports Mauritius from WORLD ex EU27 in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	2710	Petroleum oils and oils obtained fr	869.9	20.4%	1		Petroleum oils and oils obtained fr	1016.8	24.2%
2	303	Motor cars and other motor vehicles	162.3	3.8%	2		Fish, frozen, excluding fish fillet	116.4	2.8%
3	8703	Fish, frozen, excluding fish fillet	136.0	3.2%	3		Motor cars and other motor vehicles	106.6	2.5%
4	3004	Transmission apparatus for radio-te	124.4	2.9%	4		Transmission apparatus for radio-te	92.9	2.2%
5	8525	Medicaments (excluding goods of health	80.1	1.9%	5		Woven fabrics of cotton, containing	76.8	1.8%
6	2711	Coal; briquettes, ovoids and simila	66.0	1.5%	6		Diamonds, whether or not worked,	74.3	1.8%
7	8471	Motor vehicles for the transport of	65.7	1.5%	7		Coal; briquettes, ovoids and simila	69.1	1.6%

Top 20 imports Mauritius from WORLD ex EU27 in 2019					Top 20 imports Mauritius from WORLD ex EU27 in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
8	2701	Automatic data processing machines	60.0	1.4%	8		Petroleum gases and other gaseous h	68.1	1.6%
9	7102	Petroleum gases and other gaseous h	59.7	1.4%	9		Automatic data processing machines	65.4	1.6%
10	2402	Cigars, cheroots, cigarillos and ci	58.4	1.4%	10		Cigars, cheroots, cigarillos and ci	60.8	1.4%
11	1001	Cotton, not carded or combed.	51.6	1.2%	11		Rice.	57.9	1.4%
12	1006	Portland cement, aluminous cement,	49.0	1.1%	12		Portland cement, aluminous cement,	57.2	1.4%
13	2523	Rice.	48.9	1.1%	13		Fishing vessels; factory ships and	56.4	1.3%
14	402	Milk and cream, concentrated or con	48.1	1.1%	14		Medicaments (excluding goods of hea	54.0	1.3%
15	5201	Cotton yarn (other than sewing thread	42.6	1.0%	15		Milk and cream, concentrated or con	52.5	1.3%
16	8902	Woven fabrics of cotton, containing	42.0	1.0%	16		Cotton yarn (other than sewing thre	46.4	1.1%
17	8517	Reception apparatus for television,	40.6	1.0%	17		Cotton, not carded or combed.	44.2	1.1%
18	8528	Structures (excluding prefabricated	35.8	0.8%	18		Wheat and meslin.	35.7	0.9%
19	406	Cane or beet sugar and chemically p	34.8	0.8%	19		Motor vehicles for the transport of	33.7	0.8%
20	3304	Insulated (including enamelled or a	28.7	0.7%	20		Electrical apparatus for line telep	32.2	0.8%
		Total goods exports	4273.7	100.0%			Total goods exports	4193.1	100.0%

Top 20 imports Mauritius from WORLD ex EU27 in 2019					Top 20 imports Mauritius from WORLD ex EU27 in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
		Total of top 5 exports	1372.8	32%			Total of top 5 exports	1409.5	33.6%
		HHI top 5	0.4				HHI top 5	0.5	
		Total of top 10 exports	1682.6	39.4%			Total of top 10 exports	1747.0	41.7%
		HHI top 10	0.30				HHI top 10	0.36	
		Total of top 20 exports	2104.7	49.2%			Total of top 20 exports	2217.3	52.9%
		HHI top 20	0.19				HHI top 20	0.23	

Source: UN Comtrade data

Table 62: Top 20 imports Mauritius from EAC

Top 20 imports Mauritius from EAC ex EU27 in 2019					Top 20 imports Mauritius from EAC in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	2402	Cigars, cheroots, cigarillos and	34.0	79.2%	1	2402	Cigars, cheroots, cigarillos	39.8	68.8%
2	5201	Cotton, not carded or combed.	1.7	4.0%	2	7102	Diamonds, whether or not worked,	6.7	11.6%
3	102	Live bovine animals.	1.4	3.4%	3	5201	Cotton, not carded or combed.	5.5	9.4%
4	603	Cut flowers and flower buds	0.9	2.2%	4	102	Live bovine animals.	1.7	2.9%
5	902	Tea, whether or not flavoured.	0.9	2.1%	5	2202	Waters, including mineral waters	0.8	1.3%
6	3004	Medicaments (excluding goods of health	0.9	2.0%	6	3004	Medicaments (excluding goods of health	0.6	1.1%
7	3402	Organic surface-active agents (others	0.8	1.9%	7	3402	Organic surface-active agents (others	0.5	0.8%
8	2202	Waters, including mineral waters	0.4	0.9%	8	713	Dried leguminous vegetables, shelle	0.3	0.5%

Top 20 imports Mauritius from EAC ex EU27 in 2019					Top 20 imports Mauritius from EAC in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
9	8431	Parts suitable for use solely	0.2	0.5%	9	7103	Precious stones (other than diamond)	0.3	0.5%
10	2710	Petroleum oils and oils obtained fr	0.2	0.4%	10	304	Fish fillets and other fish meat	0.2	0.3%
11	303	Fish, frozen, excluding fish fillet	0.1	0.3%	11	6204	Women's or girls' suits, ensembles,	0.2	0.3%
12	2106	Food preparations not elsewhere	0.1	0.3%	12	4811	Paper, paperboard, cellulose waddin	0.1	0.2%
13	304	Fish fillets and other fish meat	0.1	0.3%	13	3306	Preparations for oral or dental hygienie	0.1	0.2%
14	7010	Carboys, bottles, flasks, jars, pot	0.1	0.3%	14	2306	Oil-cake and other solid residues,	0.1	0.2%
15	1302	Vegetable saps and extracts; pectic	0.1	0.3%	15	1702	Other sugars, including chemically	0.1	0.2%
16	3306	Preparations for oral or dental hyg	0.1	0.2%	16	603	Cut flowers and flower buds of a ki	0.1	0.2%
17	713	Dried leguminous vegetables, shelle	0.1	0.2%	17	902	Tea, whether or not flavoured.	0.1	0.1%
18	905	Vanilla.	0.1	0.1%	18	3405	Polishes and creams, for footwear,	0.1	0.1%
19	402	Milk and cream, concentrated or con	0.1	0.1%	19	9030	Oscilloscopes, spectrum analysers a	0.1	0.1%
20	8507	Electric accumulators, including se	0.1	0.1%	20	3808	Insecticides, rodenticides, fungici	0.1	0.1%
		Total goods exports	42.8	100.0%			Total goods exports	57.8	100.0%
		Total of top 5 exports	39.0	91%			Total of top 5 exports	54.4	94%
		HHI top 5	0.8				HHI top 5	0.6	
		Total of top 10 exports	41.4	96.7%			Total of top 10 exports	56.2	97.3%
		HHI top 10	0.68				HHI top 10	0.52	
		Total of top 20 exports	42.5	99.1%			Total of top 20 exports	57.3	99.1%

Top 20 imports Mauritius from EAC ex EU27 in 2019					Top 20 imports Mauritius from EAC in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
		HHI top 20	0.64				HHI top 20	0.51	

Source: UN Comtrade data

Table 63: Top 20 imports Mauritius from SADC

Top 20 imports Mauritius from SADC in 2019					Top 20 imports Mauritius from SADC in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	2710	Petroleum oils and oils obtained fr	102.8	16.9%	1	2701	Coal; briquettes, ovoids and simila	69.1	14.9%
2	303	Fish, frozen, excluding fish fillet	64.2	10.5%	2	303	Fish, frozen, excluding fish fillet	50.2	10.8%
3	2701	Coal; briquettes, ovoids and simila	61.6	10.1%	3	5201	Cotton, not carded or combed.	41.8	9.0%
4	5201	Cotton, not carded or combed.	44.0	7.2%	4	8704	Motor vehicles for the transport	17.0	3.7%
5	905	Vanilla.	21.7	3.6%	5	2402	Cigars, cheroots, cigarillos	12.1	2.6%
6	2402	Cigars, cheroots, cigarillos and ci	19.4	3.2%	6	2106	Food preparations not elsewhere spe	10.3	2.2%
7	8704	Motor vehicles for the transport of	17.3	2.8%	7	2713	Petroleum coke, petroleum bitumen a	9.1	2.0%
8	102	Live bovine animals.	15.1	2.5%	8	7102	Diamonds, whether or not worked, bu	8.0	1.7%
9	2106	Food preparations not elsewhere spe	14.7	2.4%	9	808	Apples, pears and quinces, fresh.	7.1	1.5%
10	8528	Reception apparatus for television,	10.8	1.8%	10	3004	Medicaments (excluding goods of health	6.5	1.4%
11	3004	Medicaments (excluding goods of health	7.9	1.3%	11	2009	Fruit juices (including grape must)	6.0	1.3%
12	7213	Bars and rods, hot-rolled, in irreg	7.6	1.2%	12	1604	Prepared or preserved fish; caviar	5.1	1.1%

Top 20 imports Mauritius from SADC in 2019					Top 20 imports Mauritius from SADC in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1 3	808	Apples, pears and quinces, fresh.	6.8	1.1%	1 3	7214	Other bars and rods of iron or non-	4.4	0.9%
1 4	805	Citrus fruit, fresh or dried.	5.8	0.9%	1 4	2710	Petroleum oils and oils obtained fr	4.1	0.9%
1 5	4407	Wood sawed or chipped lengthwise,	5.0	0.8%	1 5	805	Citrus fruit, fresh or dried.	4.1	0.9%
1 6	2009	Fruit juices (including grape must)	4.1	0.7%	1 6	102	Live bovine animals.	4.0	0.9%
1 7	1905	Bread, pastry, cakes, biscuits and	3.7	0.6%	1 7	8528	Reception apparatus for television,	3.7	0.8%
1 8	1604	Prepared or preserved fish; caviar	3.6	0.6%	1 8	4407	Wood sawed or chipped lengthwise,	3.6	0.8%
1 9	2204	Wine of fresh grapes, including for	3.4	0.6%	1 9	1507	Soya-bean oil and its fractions,	3.6	0.8%
2 0	8471	Automatic data processing machines	3.3	0.5%	2 0	7108	Gold (including gold plated with pl	3.5	0.7%
		Total goods exports	609.0	100.0%			Total goods exports	463.9	100.0%
		Total of top 5 exports	294.3	48%			Total of top 5 exports	190.2	41%
		HHI top 5	0.2				HHI top 5	0.3	
		Total of top 10 exports	371.6	61.0%			Total of top 10 exports	231.1	49.8%
		HHI top 10	0.16				HHI top 10	0.18	
		Total of top 20 exports	422.7	69.4%			Total of top 20 exports	272.9	58.8%
		HHI top 20	0.13				HHI top 20	0.13	

Source: UN Comtrade data

Table 64: Top 20 imports Mauritius from COMESA

Top 20 imports Mauritius from COMESA in 2019					Top 20 imports Mauritius from COMESA in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	303	Fish, frozen, excluding fish fillet	62.5	27.9%	1	303	Fish, frozen, excluding fish fillet	49.3	27.7%
2	2402	Cigars, cheroots, cigarillos and ci	34.0	15.2%	2	2402	Cigars, cheroots, cigarillos and ci	39.8	22.4%
3	5201	Cotton, not carded or combed.	27.3	12.2%	3	5201	Cotton, not carded or combed.	17.3	9.7%
4	905	Vanilla.	21.6	9.7%	4	7214	Other bars and rods of iron or non-	12.5	7.0%
5	2106	Food preparations not elsewhere spe	13.5	6.0%	5	2106	Food preparations not elsewhere spe	8.2	4.6%
6	1507	Soya-bean oil and its fractions, wh	9.8	4.4%	6	7213	Bars and rods, hot-rolled, in irreg	6.2	3.5%
7	1701	Cane or beet sugar and chemically p	6.0	2.7%	7	713	Dried leguminous vegetables, shelle	3.1	1.8%
8	4407	Wood sawed or chipped lengthwise,	4.0	1.8%	8	4407	Wood sawed or chipped lengthwise,	2.9	1.6%
9	4818	Toilet paper and similar paper, cel	2.5	1.1%	9	406	Cheese and curd.	2.2	1.2%
10	3402	Organic surface-active agents (othe	2.3	1.0%	10	102	Live bovine animals.	1.7	0.9%
11	805	Citrus fruit, fresh or dried.	2.2	1.0%	11	3402	Organic surface-active agents (othe	1.7	0.9%
12	713	Dried leguminous vegetables, shelle	1.8	0.8%	12	307	Molluscs, whether in shell or not,	1.6	0.9%
13	1605	Crustaceans, molluscs and other aqu	1.7	0.8%	13	905	Vanilla.	1.5	0.8%
14	1517	Margarine; edible mixtures or prepa	1.6	0.7%	14	4819	Cartons, boxes, cases, bags and oth	1.4	0.8%
15	703	Onions, shallots, garlic, leeks and	1.5	0.7%	15	2202	Waters, including mineral waters an	1.4	0.8%

Top 20 imports Mauritius from COMESA in 2019					Top 20 imports Mauritius from COMESA in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
16	102	Live bovine animals.	1.4	0.6%	16	805	Citrus fruit, fresh or dried.	1.3	0.7%
17	5209	Woven fabrics of cotton, containing	1.2	0.5%	17	6212	Brassières, girdles, corsets, brace	1.2	0.7%
18	1512	Sunflower-seed, safflower or cotton	1.2	0.5%	18	1202	Ground-nuts, not roasted or otherwi	1.2	0.7%
19	2004	Other vegetables prepared or preser	1.2	0.5%	19	306	Crustaceans, whether in shell or no shell	1.2	0.7%
20	806	Grapes, fresh or dried.	1.1	0.5%	20	6110	Jerseys, pullovers, cardigans,	1.0	0.5%
		Total goods exports	223.9	100.0%			Total goods exports	177.7	100.0%
		Total of top 5 exports	159.0	71%			Total of top 5 exports	127.0	71%
		HHI top 5	0.3				HHI top 5	0.3	
		Total of top 10 exports	183.6	82.0%			Total of top 10 exports	143.1	80.5%
		HHI top 10	0.20				HHI top 10	0.22	
		Total of top 20 exports	198.6	88.7%			Total of top 20 exports	156.5	88.1%
		HHI top 20	0.17				HHI top 20	0.19	

Source: UN Comtrade data

Seychelles

Seychelles' goods exports to the EU

Table 65: Top 20 exports, Seychelles to EU27, 2009, 2012, 2019 (Eurostat data), trade value in million EUR, HS 2, sorted by 2019 trade value.

	2009	2012	2019	CAGR 2009 - 2012	CAGR 2012 - 2019
Total	109.6	158.4	182.4	13.0%	2.0%
PREPARATIONS OF MEAT, OF FISH OR OF CRUSTACEANS, MOLLUSCS OR OTHER AQUATIC INVERTEBRATES (1988-2500)	89.8	138.9	129.3	15.6%	-1.0%
FISH AND CRUSTACEANS, MOLLUSCS AND OTHER AQUATIC INVERTEBRATES (1988-2500)	16.1	11.5	36.0	-10.6%	17.7%
MINERAL FUELS, MINERAL OILS AND PRODUCTS OF THEIR DISTILLATION; BITUMINOUS SUBSTANCES; MINERAL WAXES (1988-2500)	0.0	0.0	9.8	-2.3%	216.4%
SHIPS, BOATS AND FLOATING STRUCTURES (1988-2500)	1.3	2.3	2.0	19.4%	-1.9%
OPTICAL, PHOTOGRAPHIC, CINEMATOGRAPHIC, MEASURING, CHECKING, PRECISION, MEDICAL OR SURGICAL INSTRUMENTS AND APPARATUS; PARTS AND ACCESSORIES THEREOF (1988-2500)	1.2	1.4	1.6	4.2%	2.5%
NUCLEAR REACTORS, BOILERS, MACHINERY AND MECHANICAL APPLIANCES; PARTS THEREOF (1988-2500)	0.1	0.2	0.4	13.6%	10.3%
OTHER PRODUCTS (1988-2500)	0.1	2.4	0.4	164.8%	-23.1%
BEVERAGES, SPIRITS AND VINEGAR (1988-2500)	0.0	0.0	0.3	23.3%	41.7%
ANIMAL OR VEGETABLE FATS AND OILS AND THEIR CLEAVAGE PRODUCTS; PREPARED EDIBLE FATS; ANIMAL OR VEGETABLE WAXES (1988-2500)	0.2	0.2	0.3	-8.9%	8.7%
ELECTRICAL MACHINERY AND EQUIPMENT AND PARTS THEREOF; SOUND RECORDERS AND REPRODUCERS, TELEVISION IMAGE AND SOUND RECORDERS AND REPRODUCERS, AND PARTS AND ACCESSORIES OF SUCH ARTICLES (1988-2500)	0.1	0.2	0.2	45.6%	-4.4%
VEHICLES OTHER THAN RAILWAY OR TRAMWAY ROLLING STOCK, AND PARTS AND ACCESSORIES THEREOF (1988-2500)	0.0	0.2	0.2	60.6%	-2.3%
WADDING, FELT AND NONWOVENS; SPECIAL YARNS; TWINE, CORDAGE, ROPES AND CABLES AND ARTICLES THEREOF (1988-2500)	N/A	0.0	0.1	N/A	116.4%
COFFEE, TEA, MATE AND SPICES (1988-2500)	0.0	0.0	0.1	-3.5%	27.8%
COPPER AND ARTICLES THEREOF (1988-2500)	0.0	0.3	0.1	218.8%	-13.6%
WORKS OF ART, COLLECTORS' PIECES AND ANTIQUES (1988-2500)	0.1	0.0	0.1	-46.8%	38.3%
UMBRELLAS, SUN UMBRELLAS, WALKING STICKS, SEAT-STICKS, WHIPS, RIDING-CROPS AND PARTS THEREOF (1988-2500)	N/A		0.1	N/A	N/A
ESSENTIAL OILS AND RESINOIDS; PERFUMERY, COSMETIC OR TOILET PREPARATIONS (1988-2500)	0.0	0.0	0.1	-63.8%	124.7%
OTHER MADE-UP TEXTILE ARTICLES; SETS; WORN CLOTHING AND WORN TEXTILE ARTICLES; RAGS (1988-2500)	0.0	0.1	0.1	155.1%	-5.7%
AIRCRAFT, SPACECRAFT, AND PARTS THEREOF (1988-2500)	0.0	0.1	0.1	144.3%	-11.0%
LIVE ANIMALS (1988-2500)	0.0	0.0	0.1	-48.9%	38.9%

	2009	2012	2019	CAGR 2009 - 2012	CAGR 2012 - 2019
Share top 5 imports	99%	97%	98%		
Share top 10 imports	100%	99%	99%		
Share top 20 imports	100%	100%	99%		

Source: Eurostat

Table 66: Top 20 exports, Seychelles to EU27, 2009, 2012, 2019 (UN Comtrade data), trade value in million USD, HS 4, sorted by 2019 trade value.

2019					2012				2010			
	Produ ct code	Description	Trade value in million USD	Share in total trade	Produ ct code	Description	Trade value in million USD	Share in total trade	Produ ct code	Description	Trade value in million USD	Share in total trade
1	1604	Prepared or preserved fish; caviar	226.7	76.2%	1604	Prepared or preserved fish; caviar	394.9	97.7%	1604	Prepared or preserved fish; caviar	183.0	82.7%
2	8903	Yachts and other vessels for pleasu	47.6	16.0%	9020	Other breathing appliances and gas	1.6	0.4%	302	Fish, fresh or chilled, excluding f	17.8	8.0%
3	303	Fish, frozen, excluding fish fillet	18.6	6.3%	2301	Flours, meals and pellets, of meat	1.5	0.4%	8903	Yachts and other vessels for pleasure	7.9	3.6%
4	9018	Instruments and appliances used in	0.9	0.3%	8803	Parts of goods of heading 88.01 or	1.4	0.3%	8803	Parts of goods of heading 88.01 or	6.2	2.8%
5	304	Fish fillets and other fish meat (w	0.7	0.2%	302	Fish, fresh or chilled, excluding f	0.9	0.2%	9018	Instruments and appliances used in	1.8	0.8%
6	8803	Parts of goods of heading 88.01 or	0.5	0.2%	8407	Spark-ignition reciprocating or rot	0.8	0.2%	305	Fish, dried, salted or in brine; sm	1.4	0.6%
7	1504	Fats and oils and their fractions,	0.3	0.1%	8544	Insulated (including enamelled or a	0.6	0.1%	1504	Fats and oils and their fractions,	1.3	0.6%
8	8703	Motor cars and other motor vehicles	0.3	0.1%	9018	Instruments and appliances used in	0.5	0.1%	304	Fish fillets and other fish meat (w	0.4	0.2%
9	9018	Instruments and appliances used in	0.3	0.1%	9015	Surveying (including photogrammetrical	0.5	0.1%	303	Fish, frozen, excluding fish fillet	0.4	0.2%
10	2208	Undenatured ethyl alcohol of an alc	0.2	0.1%	303	Fish, frozen, excluding fish fillet	0.3	0.1%	9701	Paintings, drawings and pastels, ex	0.3	0.1%

2019					2012				2010			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
11	8409	Parts suitable for use solely or tpr	0.1	0.0%	8517	Electrical apparatus for line telep	0.3	0.1%	7311	Containers for compressed or liquefy	0.2	0.1%
12	9031	Measuring or checking instruments,	0.1	0.0%	9006	Photographic (other than cinematogr	0.1	0.0%	8409	Parts suitable for use solely or tpr	0.1	0.0%
13	5608	Knotted netting of twine, cordage o	0.1	0.0%	8903	Yachts and other vessels for pleasure	0.1	0.0%	9005	Binoculars, monoculars, other optics	0.1	0.0%
14	302	Fish, fresh or chilled, excluding f	0.1	0.0%	9004	Spectacles, goggles and the like, c	0.1	0.0%	106	Other live animals.	0.1	0.0%
15	8907	Other floating structures (for exam	0.1	0.0%	8511	Electrical ignition or starting equ	0.1	0.0%	8528	Reception apparatus for television,	0.1	0.0%
16	2301	Flours, meals and pellets, of meat	0.1	0.0%	8703	Motor cars and other motor vehicles	0.1	0.0%	906	Cinnamon and cinnamon-tree flowers.	0.1	0.0%
17	7326	Other articles of iron or steel.	0.1	0.0%	9207	Musical instruments, the sound of w	0.1	0.0%	8485	Machinery parts, not containing	0.0	0.0%
18	4011	New pneumatic tyres, of rubber.	0.1	0.0%	2208	Undenatured ethyl alcohol of an alc	0.1	0.0%	9014	Direction finding compasses; other	0.0	0.0%
19	906	Cinnamon and cinnamon-tree flowers.	0.1	0.0%	9033	Parts and accessories (not specifie	0.1	0.0%	9202	Other string musical instruments (f	0.0	0.0%
20	3926	Other articles of plastics and arti	0.1	0.0%	1504	Fats and oils and their fractions,	0.0	0.0%	9030	Oscilloscopes, spectrum analysers a	0.0	0.0%
		Total goods exports	297.6	100.0%		Total goods exports	404.3	100.0%		Total goods exports	221.3	100.0%
		Total of top 5 exports	294.5	99%			400.3	99%			216.6	98%
		HHI top 5	0.6				1.0				0.7	

2019					2012				2010			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
		Total of top 10 exports	296.1	100%			402.9	100%			220.3	100%
		HHI top 10	0.62				0.96				0.70	
		Total of top 20 exports	297.2	99.9%			404.0	99.9%			221.0	99.8%
		HHI top 20	0.61				0.96				0.69	

Source: UN Comtrade data

Table 67: Top 20 exports, Seychelles to EU27, compound annual growth rate (CAGR), 2012-2019, 2010-2012

	2019	2019	2019	2012	2010	Post tariff elimination	Pre tariff elimination
	Product code	Description	Trade value in million USD	Trade value in million USD	Trade value in million USD	CAGR 2012 - 2019	CAGR 2010 - 2012
1	1604	Prepared or preserved fish; caviar	226.7	394.9	183.0	-7.6%	29.2%
2	8903	Yachts and other vessels for pleasure	47.6	n/a	7.9	n/a	n/a
3	303	Fish, frozen, excluding fish fillet	18.6	0.3	0.4	76.4%	-4.4%
4	9018	Instruments and appliances used in	0.9	0.5	1.8	8.5%	-33.5%
5	304	Fish fillets and other fish meat (w	0.7	n/a	0.4	n/a	n/a
6	8803	Parts of goods of heading 88.01 or	0.5	1.4	6.2	-13.2%	-39.3%
7	1504	Fats and oils and their fractions,	0.3	0.0	1.3	31.4%	-66.9%
8	8703	Motor cars and other motor vehicles	0.3	0.1	n/a	22.0%	n/a
9	9018	Instruments and appliances used in	0.3	0.5	1.8	-9.2%	-33.5%
10	2208	Undenatured ethyl alcohol of an alc	0.2	0.1	0.0	16.1%	420.4%
11	8409	Parts suitable for use solely or†pr	0.1	0.0	0.1	32.9%	-42.9%
12	9031	Measuring or checking instruments,	0.1	n/a	n/a	n/a	n/a

13	5608	Knotted netting of twine, cordage o	0.1	n/a	n/a	n/a	n/a
14	302	Fish, fresh or chilled, excluding f	0.1	0.9	17.8	-24.4%	-63.3%
15	8907	Other floating structures (for exam	0.1	0.0	0.0	72.1%	93.8%
16	2301	Flours, meals and pellets, of meat	0.1	1.5	n/a	-31.9%	n/a
17	7326	Other articles of iron or steel.	0.1	n/a	n/a	n/a	n/a
18	4011	New pneumatic tyres, of rubber.	0.1	n/a	n/a	n/a	n/a
19	906	Cinnamon and cinnamon-tree flowers.	0.1	0.0	0.1	12.8%	-15.2%
20	3926	Other articles of plastics and arti	0.1	n/a	n/a	n/a	n/a
		Total goods exports	297.6	404.3	221.3	-4.3%	22.2%

Source: UN Comtrade data

Seychelles' goods imports from the EU

Table 68: Top 20 imports, Seychelles from EU27, 2009, 2012, 2019 (Eurostat data), trade value in million EUR, HS 2, sorted by 2019 trade value.

	2009	2013	2019	CAGR 2009 - 2013	CAGR 2012 - 2019
Total	158.8	299.4	265.2	17.2%	-2.0%
AIRCRAFT, SPACECRAFT, AND PARTS THEREOF (1988-2500)	0.7	1.6	67.0	20.9%	87.0%
NUCLEAR REACTORS, BOILERS, MACHINERY AND MECHANICAL APPLIANCES; PARTS THEREOF (1988-2500)	21.7	38.8	33.1	15.7%	-2.6%
FISH AND CRUSTACEANS, MOLLUSCS AND OTHER AQUATIC INVERTEBRATES (1988-2500)	53.9	102.6	31.7	17.4%	-17.8%
ELECTRICAL MACHINERY AND EQUIPMENT AND PARTS THEREOF; SOUND RECORDERS AND REPRODUCERS, TELEVISION IMAGE AND SOUND RECORDERS AND REPRODUCERS, AND PARTS AND ACCESSORIES OF SUCH ARTICLES (1988-2500)	7.1	11.4	27.6	12.6%	15.9%
BEVERAGES, SPIRITS AND VINEGAR (1988-2500)	2.7	5.8	9.9	21.3%	9.3%
ARTICLES OF IRON OR STEEL (1988-2500)	6.0	7.2	8.1	4.6%	1.8%
SHIPS, BOATS AND FLOATING STRUCTURES (1988-2500)	15.9	46.0	7.9	30.5%	-25.4%
OPTICAL, PHOTOGRAPHIC, CINEMATOGRAPHIC, MEASURING, CHECKING, PRECISION, MEDICAL OR SURGICAL INSTRUMENTS AND APPARATUS; PARTS AND ACCESSORIES THEREOF (1988-2500)	1.7	2.8	6.5	13.4%	15.0%
DAIRY PRODUCE; BIRDS' EGGS; NATURAL HONEY; EDIBLE PRODUCTS OF ANIMAL ORIGIN, NOT ELSEWHERE SPECIFIED OR INCLUDED (1988-2500)	1.9	2.8	6.2	9.7%	14.3%

	2009	2013	2019	CAGR 2009 - 2013	CAGR 2012 - 2019
OTHER PRODUCTS (1988-2500)	4.2	14.4	5.3	36.1%	-15.3%
MISCELLANEOUS ARTICLES OF BASE METAL (1988-2500)	8.9	10.8	4.8	5.0%	-12.7%
WADDING, FELT AND NONWOVENS; SPECIAL YARNS; TWINE, CORDAGE, ROPES AND CABLES AND ARTICLES THEREOF (1988-2500)	1.9	2.9	4.7	11.3%	8.6%
IRON AND STEEL (1988-2500)	1.7	3.8	4.0	22.0%	1.0%
MEAT AND EDIBLE MEAT OFFAL (1988-2500)	1.4	2.5	3.4	16.0%	5.3%
PREPARATIONS OF VEGETABLES, FRUIT, NUTS OR OTHER PARTS OF PLANTS (1988-2500)	0.6	1.3	2.9	20.8%	13.4%
PLASTICS AND ARTICLES THEREOF (1988-2500)	2.2	2.0	2.8	-2.0%	6.0%
MISCELLANEOUS EDIBLE PREPARATIONS (1988-2500)	1.1	3.4	2.8	32.0%	-3.4%
ANIMAL OR VEGETABLE FATS AND OILS AND THEIR CLEAVAGE PRODUCTS; PREPARED EDIBLE FATS; ANIMAL OR VEGETABLE WAXES (1988-2500)	2.6	5.1	2.7	18.2%	-9.9%
VEHICLES OTHER THAN RAILWAY OR TRAMWAY ROLLING STOCK, AND PARTS AND ACCESSORIES THEREOF (1988-2500)	2.1	2.4	2.7	3.4%	2.1%
ESSENTIAL OILS AND RESINOIDS; PERFUMERY, COSMETIC OR TOILET PREPARATIONS (1988-2500)	0.9	3.8	2.5	44.7%	-6.8%
Share top 5 exports	54%	53%	64%		
Share top 10 exports	73%	78%	77%		
Share top 20 exports	88%	91%	89%		

Source: Eurostat

Table 69: Top 20 imports, Seychelles from EU27, 2009, 2012, 2019 (UN Comtrade data), trade value in million USD, HS 4, sorted by 2019 trade value.

2019					2013				2010			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
1	303	Fish, frozen, excluding fish fillet	97.3	29.5%	303	Fish, frozen, excluding fish fillet	126.8	46.7%	303	Fish, frozen, excluding fish fillet	88.2	33.5%
2	8903	Yachts and other vessels for pleasure	17.2	5.2%	8309	Stoppers, caps and lids (including	16.2	6.0%	8309	Stoppers, caps and lids (including	19.2	7.3%
3	8907	Other floating structures (for example	14.5	4.4%	1509	Olive oil and its fractions,	8.4	3.1%	1509	Olive oil and its fractions,	9.1	3.4%
4	8418	Refrigerators, freezers and other	6.8	2.1%	2208	Undenatured ethyl alcohol of an alc	5.9	2.2%	7210	Flat-rolled products of iron or non	6.9	2.6%

2019					2013				2010			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
5	7310	Tanks, casks, drums, cans, boxes and	6.4	1.9%	8903	Yachts and other vessels for pleasure	5.7	2.1%	8803	Parts of goods of heading 88.01 or	6.7	2.5%
6	7210	Flat-rolled products of iron or non	5.5	1.7%	7210	Flat-rolled products of iron or non	4.4	1.6%	8903	Yachts and other vessels for pleasure	4.5	1.7%
7	8309	Stoppers, caps and lids (including	5.2	1.6%	2204	Wine of fresh grapes, including for	4.2	1.5%	9405	Lamps and lighting fittings	3.6	1.4%
8	2204	Wine of fresh grapes, including for	5.1	1.5%	8409	Parts suitable for use solely or pr	3.5	1.3%	2204	Wine of fresh grapes, including for	3.2	1.2%
9	5608	Knotted netting of twine, cordage o	4.8	1.5%	8422	Dish washing machines; machinery fo	2.9	1.1%	9403	Other furniture and parts thereof.	3.1	1.2%
10	2208	Undenatured ethyl alcohol of an alc	4.8	1.5%	8413	Pumps for liquids, whether or not f	2.1	0.8%	8517	Electrical apparatus for line telep	3.0	1.1%
11	8803	Parts of goods of heading 88.01 or	4.5	1.4%	9403	Other furniture and parts thereof.	1.9	0.7%	6908	Glazed ceramic flags and paving, he	2.7	1.0%
12	1512	Sunflower-seed, safflower or cotton	4.4	1.3%	8517	Electrical apparatus for line telep	1.9	0.7%	1512	Sunflower-seed, safflower or cotton	2.5	1.0%
13	406	Cheese and curd.	3.3	1.0%	203	Meat of swine, fresh, chilled or fr	1.8	0.7%	7013	Glassware of a kind used for table,	2.4	0.9%
14	8507	Electric accumulators, including se	2.8	0.8%	1512	Sunflower-seed, safflower or cotton	1.7	0.6%	7310	Tanks, casks, drums, cans, boxes and	2.3	0.9%
15	403	Buttermilk, curdled milk and cream,	2.7	0.8%	8418	Refrigerators, freezers and other r	1.7	0.6%	8418	Refrigerators, freezers and other r	2.1	0.8%
16	3004	Medicaments (excluding goods of hea	2.6	0.8%	8703	Motor cars and other motor vehicles	1.6	0.6%	7610	Aluminium structures (excluding pre	1.7	0.6%
17	8422	Dish washing machines; machinery fo	2.5	0.8%	8421	Centrifuges, including centrifugal	1.6	0.6%	8421	Centrifuges, including centrifugal	1.7	0.6%

2019					2013				2010			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
18	2203	Beer made from malt.	2.4	0.7%	406	Cheese and curd.	1.5	0.5%	8422	Dish washing machines; machinery fo	1.7	0.6%
19	8703	Motor cars and other motor vehicles	2.3	0.7%	8536	Electrical apparatus for switching	1.3	0.5%	2208	Undenatured ethyl alcohol of an alc	1.5	0.6%
20	8705	Special purpose motor vehicles, oth	2.3	0.7%	7326	Other articles of iron or steel.	1.3	0.5%	8708	Parts and accessories of the motor	1.5	0.6%
		Total goods imports from EU27	330.0	100.0%		Total goods imports from EU27	271.4	100.0%		Total goods imports from EU27	263.3	100.0%
		Total of top 5 exports	142.1	43%			163.0	60%			130.1	49%
		HHI top 5	0.5				0.6				0.5	
		Total of top 10 exports	167.5	51%			180.1	66%			147.5	56%
		HHI top 10	0.36				0.51				0.39	
		Total of top 20 exports	197.4	59.8%			196.4	72.4%			167.6	63.6%
		HHI top 20	0.26				0.43				0.30	

Source: UN Comtrade data

Table 70: Top 20 imports, Seychelles from EU27, compound annual growth rate (CAGR), 2012-2019, 2010-2012

	2019	2019	2019	2013	2010	Post tariff elimination	Pre tariff elimination
	Product code	Description	Trade value in million USD	Trade value in million USD	Trade value in million USD	CAGR 2013 - 2019	CAGR 2010 - 2013
1	303	Fish, frozen, excluding fish fillet	97.3	126.8	88.2	-4.3%	12.9%
2	8903	Yachts and other vessels for pleasure	17.2	5.7	4.5	20.2%	8.4%
3	8907	Other floating structures (for exam	14.5	0.9	0.1	58.5%	132.9%

	2019	2019	2019	2013	2010	Post tariff elimination	Pre tariff elimination
	Product code	Description	Trade value in million USD	Trade value in million USD	Trade value in million USD	CAGR 2013 - 2019	CAGR 2010 - 2013
4	8418	Refrigerators, freezers and other r	6.8	1.7	2.1	26.2%	-7.0%
5	7310	Tanks, casks, drums, cans, boxes an	6.4	1.1	2.3	34.3%	-21.8%
6	7210	Flat-rolled products of iron or non	5.5	4.4	6.9	3.7%	-13.5%
7	8309	Stoppers, caps and lids (including	5.2	16.2	19.2	-17.2%	-5.6%
8	2204	Wine of fresh grapes, including for	5.1	4.2	3.2	3.3%	9.6%
9	5608	Knotted netting of twine, cordage o	4.8	0.0	0.0	126.5%	119.5%
10	2208	Undenatured ethyl alcohol of an alc	4.8	5.9	1.5	-3.3%	56.2%
11	8803	Parts of goods of heading 88.01 or	4.5	0.7	6.7	37.2%	-53.3%
12	1512	Sunflower-seed, safflower or cotton	4.4	1.7	2.5	16.9%	-11.8%
13	406	Cheese and curd.	3.3	1.5	1.4	14.4%	2.8%
14	8507	Electric accumulators, including se	2.8	0.1	0.1	89.9%	-12.8%
15	403	Buttermilk, curdled milk and cream,	2.7	0.8	0.7	21.5%	7.9%
16	3004	Medicaments (excluding goods of hea	2.6	1.3	1.1	12.4%	6.0%
17	8422	Dish washing machines; machinery fo	2.5	2.9	1.7	-2.2%	19.7%
18	2203	Beer made from malt.	2.4	1.0	0.2	16.0%	81.2%
19	8703	Motor cars and other motor vehicles	2.3	1.6	0.4	6.1%	57.6%
20	8705	Special purpose motor vehicles, oth	2.3	1.2	0.5	11.7%	37.1%
		Total goods imports from EU27	330.0	271.4	263.3	2.8%	1.0%

Source: UN Comtrade data

Seychelles goods exports to non-EU jurisdictions

Table 71: Top 20 exports Seychelles to WORLD ex EU27

Top 20 exports Seychelles to WORLD ex EU27 in 2019					Top 20 exports Seychelles to WORLD ex EU27 in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	8803	Fish, frozen, excluding fish fillet	40.3	32.1%	1		Prepared or preserved fish; caviar	10.3	23.0%
2	2301	Yachts and other vessels for pleasure	30.7	24.5%	2		Flours, meals and pellets, of meat	7.6	17.0%
3	8526	Cigars, cheroots, cigarillos and ci	18.6	14.8%	3		Parts of goods of heading 88.01 or	4.4	9.7%
4	305	Flours, meals and pellets, of meat	14.3	11.4%	4		Radar apparatus, radio navigational	3.5	7.8%
5	8409	Fats and oils and their fractions,	4.8	3.8%	5		Fish, dried, salted or in brine;	3.3	7.3%
6	1504	Crustaceans, molluscs and other aqua	4.3	3.4%	6		Parts suitable for use solely or tpr	3.1	7.0%
7	302	Motor cars and other motor vehicles	1.8	1.4%	7		Fats and oils and their fractions,	1.6	3.5%
8	9020	Other nuts, fresh or dried, whether	1.4	1.1%	8		Other breathing appliances and gas	1.2	2.8%
9	8407	Fish, fresh or chilled, excluding f	1.0	0.8%	9		Yachts and other vessels for pleasure	1.0	2.2%
10	8429	Other aircraft (for example, helico	0.8	0.6%	10		Fish, frozen, excluding fish fillet	0.6	1.4%
11	9018	Containers for compressed or liquef	0.7	0.6%	11		Self-propelled bulldozers, angledoz	0.6	1.4%
12	8903	Parts of goods of heading 88.01 or	0.7	0.6%	12		Instruments and appliances used in	0.6	1.3%
13	8465	Ferrous waste and scrap; remelting	0.7	0.6%	13		Surveying (including photogrammetri	0.5	1.2%
14	8544	Other live animals.	0.7	0.5%	14		Spark-ignition reciprocating or rot	0.5	1.1%

Top 20 exports Seychelles to WORLD ex EU27 in 2019					Top 20 exports Seychelles to WORLD ex EU27 in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
15	9015	Reservoirs, tanks, vats and similar	0.5	0.4%	15		Ferrous waste and scrap; remelting	0.4	0.9%
16	7204	Electrical machines and apparatus,	0.3	0.3%	16		Coconuts, Brazil nuts and cashew nuts	0.4	0.9%
17	801	Instruments and appliances used in	0.3	0.2%	17		Fish, fresh or chilled,	0.4	0.9%
18	307	Parts and accessories suitable for	0.3	0.2%	18		Molluscs, whether in shell or not,	0.4	0.9%
19	4418	Molluscs, whether in shell or not,	0.3	0.2%	19		Knotted netting of twine, cordage	0.3	0.7%
20	8703	Articles of goldsmiths' or silversm	0.3	0.2%	20		Motor cars and other motor vehicles	0.3	0.6%
		Total goods exports to EU27	125.3	100.0%			Total goods exports to EU27	44.9	100.0%
		Total of top 5 exports to EU27	108.6	87%			Total of top 5 exports to EU27	29.0	64.7%
		HHI top 5	0.3				HHI top 5	0.2	
		Total of top 10 exports to EU27	117.9	94.0%			Total of top 10 exports to EU27	36.5	81.4%
		HHI top 10	0.23				HHI top 10	0.17	
		Total of top 20 exports to EU27	122.6	97.8%			Total of top 20 exports to EU27	40.9	91.2%
		HHI top 20	0.21				HHI top 20	0.13	

Source: UN Comtrade data

Table 72: Top 20 exports Seychelles to EAC

Top 20 exports Seychelles to EAC in 2019					Top 20 exports Seychelles to EAC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	8903	Yachts and other vessels for pleasu	0.4	77.1%	1	4418	Builders' joinery and carpentry of	0.3	57.7%
2	8525	Transmission apparatus for radio-te	0.0	9.0%	2	4420	Wood marquetry and inlaid wood; cas	0.2	31.4%
3	303	Fish, frozen, excluding fish fillet	0.0	4.5%	3	801	Coconuts, Brazil nuts and cashew nu	0.0	3.7%
4	2208	Undenatured ethyl alcohol of an alc	0.0	3.9%	4	9028	Gas, liquid or electricity supply o	0.0	3.0%
5	9018	Instruments and appliances used in	0.0	2.9%	5	1513	Coconut (copra), palm kernel or bab	0.0	1.4%
6	9033	Parts and accessories (not specifie	0.0	0.9%	6	1203	Copra.	0.0	1.3%
7	8507	Electric accumulators, including se	0.0	0.8%	7	8803	Parts of goods of heading 88.01 or	0.0	1.1%
8	2710	Petroleum oils and oils obtained fr	0.0	0.5%	8	9014	Direction finding compasses; other	0.0	0.2%
9	8467	Tools for working in the hand, pneu	0.0	0.2%	9	3208	Paints and varnishes (including ena	0.0	0.1%
10	8479	Machines and mechanical appliances	0.0	0.1%	10	8516	Electric instantaneous or storage w	0.0	0.1%
11	3926	Other articles of plastics and arti	0.0	0.1%	11	7323	Table, kitchen or other household a	0.0	0.0%
12	8202	Hand saws; blades for saws of all k	0.0	0.0%	12	9403	Other furniture and parts thereof.	0.0	0.0%
13	3101	Animal or vegetable fertilisers, wh	0.0	0.0%	13				
14	8204	Hand-operated spanners and wrenches	0.0	0.0%	14				
15	8536	Electrical apparatus for switching	0.0	0.0%	15				

Top 20 exports Seychelles to EAC in 2019					Top 20 exports Seychelles to EAC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
16	9026	Instruments and apparatus for measu	0.0	0.0%	16				
17	9017	Drawing, marking-out or mathematica	0.0	0.0%	17				
18					18				
19					19				
20					20				
		Total goods exports	0.5	100.0%			Total goods exports	0.6	100.0%
		Total of top 5 exports	0.5	97%			Total of top 5 exports	0.6	97%
		HHI top 5	0.6				HHI top 5	0.5	
		Total of top 10 exports	0.5	99.8%			Total of top 10 exports	0.6	100.0%
		HHI top 10	0.61				HHI top 10	0.43	
		Total of top 20 exports	0.5	100.0%			Total of top 20 exports	0.6	100.0%
		HHI top 20	0.61				HHI top 20	0.43	

Source: UN Comtrade data

Table 73: Top 20 exports Seychelles to SADC

Top 20 exports Seychelles to SADC in 2019					Top 20 exports Seychelles to SADC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	303	Fish, frozen, excluding fish fillet	12.6	66.5%	1	8903	Yachts and other vessels for pleasu	0.8	21.0%
2	8903	Yachts and other vessels for pleasure	3.6	18.9%	2	2301	Flours, meals and pellets, of meat	0.7	19.5%
3	2301	Flours, meals and pellets, of meat	0.8	4.0%	3	8465	Machine-tools (including machines f	0.6	15.0%

Top 20 exports Seychelles to SADC in 2019					Top 20 exports Seychelles to SADC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
4	7311	Containers for compressed or liquef	0.7	3.5%	4	8803	Parts of goods of heading 88.01 or	0.3	7.2%
5	7309	Reservoirs, tanks, vats and similar	0.4	2.1%	5	9701	Paintings, drawings and pastels, ex	0.3	6.7%
6	8543	Electrical machines and apparatus,	0.3	1.7%	6	9505	Festive, carnival or other entertai	0.2	6.5%
7	8803	Parts of goods of heading 88.01 or	0.1	0.5%	7	303	Fish, frozen, excluding fish fillet	0.1	3.4%
8	7611	Aluminium reservoirs, tanks, vats a	0.1	0.4%	8	8518	Microphones and stands therefor; lo	0.1	3.3%
9	8485	Machinery parts, not containing ele	0.1	0.3%	9	302	Fish, fresh or chilled, excluding	0.1	2.6%
10	8422	Dish washing machines; machinery fo	0.0	0.3%	10	8516	Electric instantaneous or storage	0.1	2.0%
11	2309	Preparations of a kind used in anim	0.0	0.3%	11	8426	Ships' derricks; cranes, including	0.1	1.9%
12	302	Fish, fresh or chilled, excluding f	0.0	0.2%	12	9405	Lamps and lighting fittings includi	0.1	1.8%
13	7113	Articles of jewellery and parts the	0.0	0.2%	13	8205	Hand tools (including glaziers'	0.0	1.1%
14	2208	Undenatured ethyl alcohol of an alc	0.0	0.2%	14	8470	Calculating machines and pocket-siz	0.0	0.9%
15	9007	Cinematographic cameras and project	0.0	0.1%	15	8413	Pumps for liquids, whether	0.0	0.8%
16	8506	Primary cells and primary batteries	0.0	0.1%	16	8206	Tools of two or more of the heading	0.0	0.8%
17	8516	Electric instantaneous or storage w	0.0	0.1%	17	4202	Trunks, suit-cases, vanity-cases, e	0.0	0.5%
18	9703	Original sculptures and statuary, i	0.0	0.1%	18	8703	Motor cars and other motor vehicles	0.0	0.5%
19	8414	Air or vacuum pumps, air or other g	0.0	0.0%	19	8473	Parts and accessories (other than c	0.0	0.4%

Top 20 exports Seychelles to SADC in 2019					Top 20 exports Seychelles to SADC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
20	8526	Radar apparatus, radio navigational	0.0	0.0%	20	7326	Other articles of iron or steel.	0.0	0.4%
		Total goods exports	19.0	100.0%			Total goods exports	3.8	100.0%
		Total of top 5 exports	18.0	95%			Total of top 5 exports	2.6	69%
		HHI top 5	0.5				HHI top 5	0.2	
		Total of top 10 exports	18.6	98.2%			Total of top 10 exports	3.3	87.3%
		HHI top 10	0.50				HHI top 10	0.16	
		Total of top 20 exports	18.9	99.4%			Total of top 20 exports	3.6	96.4%
		HHI top 20	0.49				HHI top 20	0.13	

Source: UN Comtrade data

Table 74: Top 20 exports Seychelles to COMESA

Top 20 exports Seychelles to COMESA in 2019					Top 20 exports Seychelles to COMESA in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	303	Fish, frozen, excluding fish fillet	12.6	71.1%	1	1604	Prepared or preserved fish; caviar	1.4	31.2%
2	8903	Yachts and other vessels for pleasure	2.5	13.9%	2	2301	Flours, meals and pellets, of meat	0.7	15.8%
3	2301	Flours, meals and pellets, of meat	0.9	4.9%	3	8465	Machine-tools (including machines f	0.5	11.7%
4	7311	Containers for compressed or liquefy	0.7	3.8%	4	4418	Builders' joinery and carpentry of	0.3	7.1%
5	7309	Reservoirs, tanks, vats and similar	0.4	2.3%	5	9701	Paintings, drawings and pastels, ex	0.2	5.2%
6	8543	Electrical machines and apparatus,	0.3	1.8%	6	8705	Special purpose motor vehicles, oth	0.2	4.4%

Top 20 exports Seychelles to COMESA in 2019					Top 20 exports Seychelles to COMESA in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
7	7611	Aluminium reservoirs, tanks, vats	0.1	0.5%	7	9505	Festive, carnival or other entertai	0.2	4.1%
8	2309	Preparations of a kind used in anim	0.0	0.3%	8	4420	Wood marquetry and inlaid wood; cas	0.2	3.9%
9	8525	Transmission apparatus for radio-te	0.0	0.3%	9	303	Fish, frozen, excluding fish fillet	0.1	2.7%
10	8422	Dish washing machines; machinery fo	0.0	0.2%	10	8518	Microphones and stands therefor; lo	0.1	2.7%
11	9301	Military weapons, other than revolv	0.0	0.2%	11	302	Fish, fresh or chilled, excluding	0.1	2.1%
12	302	Fish, fresh or chilled, excluding f	0.0	0.2%	12	8516	Electric instantaneous or storage w	0.1	1.7%
13	2208	Undenatured ethyl alcohol of an alc	0.0	0.1%	13	8426	Ships' derricks; cranes, including	0.1	1.6%
14	9018	Instruments and appliances used in	0.0	0.1%	14	8205	Hand tools (including glaziers'	0.0	0.8%
15	9101	Wrist-watches, pocket-watches	0.0	0.0%	15	8470	Calculating machines and pocket-size	0.0	0.8%
16	2710	Petroleum oils and oils obtained fr	0.0	0.0%	16	8413	Pumps for liquids, whether or not f	0.0	0.5%
17	306	Crustaceans, whether in shell or no	0.0	0.0%	17	801	Coconuts, Brazil nuts and cashew nuts	0.0	0.5%
18	9033	Parts and accessories (not specified	0.0	0.0%	18	4202	Trunks, suit-cases, vanity-cases, e	0.0	0.4%
19	3926	Other articles of plastics and arti	0.0	0.0%	19	9028	Gas, liquid or electricity supply	0.0	0.4%
20	8473	Parts and accessories (other than c	0.0	0.0%	20	7326	Other articles of iron or steel.	0.0	0.3%
		Total goods exports	17.8	100.0%			Total goods exports	4.6	100.0%
		Total of top 5 exports	17.0	96%			Total of top 5 exports	3.3	71%
		HHI top 5	0.6				HHI top 5	0.3	

Top 20 exports Seychelles to COMESA in 2019					Top 20 exports Seychelles to COMESA in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
		Total of top 10 exports	17.6	99.0%			Total of top 10 exports	4.1	88.8%
		HHI top 10	0.54				HHI top 10	0.19	
		Total of top 20 exports	17.7	99.8%			Total of top 20 exports	4.5	97.8%
		HHI top 20	0.53				HHI top 20	0.16	

Source: UN Comtrade data

Seychelles goods imports from non-EU jurisdictions

Table 75: Top 20 imports Seychelles from WORLD ex EU27

Top 20 imports Seychelles from WORLD ex EU27 in 2019					Top 20 imports Seychelles from WORLD ex EU27 in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	2710	Yachts and other vessels for pleasure	330.5	29.9%	1		Petroleum oils and oils obtained fr	197.4	33.0%
2	303	Petroleum oils and oils obtained fr	227.8	20.6%	2		Other aircraft (for example, helico	23.8	4.0%
3	8802	Motor cars and other motor vehicles	23.3	2.1%	3		Motor cars and other motor vehicles	22.8	3.8%
4	8309	Parts of goods of heading 88.01 or	13.6	1.2%	4		Fish, frozen, excluding fish fillet	12.8	2.1%
5	9403	Wood sawed or chipped lengthwise,	10.5	1.0%	5		Salt (including table salt and dena	12.6	2.1%
6	2501	Other furniture and parts thereof.	10.1	0.9%	6		Flat-rolled products of iron or non	9.0	1.5%
7	2204	Portland cement, aluminous cement,	8.9	0.8%	7		Cruise ships, excursion boats, ferr	8.3	1.4%
8	8901	Motor vehicles for the transport of	8.7	0.8%	8		Yachts and other vessels for pleasu	8.2	1.4%

Top 20 imports Seychelles from WORLD ex EU27 in 2019					Top 20 imports Seychelles from WORLD ex EU27 in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
9	1006	Unmanufactured tobacco; tobacco ref	8.1	0.7%	9		Other furniture and parts thereof.	6.9	1.2%
10	7210	Flat-rolled products of iron or non	7.9	0.7%	10		Rice.	6.2	1.0%
11	4407	Cartons, boxes, cases, bags and oth	7.2	0.6%	11		Portland cement, aluminous cement,	5.7	1.0%
12	2208	Automatic data processing machines	7.0	0.6%	12		Motor vehicles for the transport of	5.4	0.9%
13	8422	Parts and accessories of the motor	6.4	0.6%	13		Cartons, boxes, cases, bags and oth	5.0	0.8%
14	402	Tubes, pipes and hoses, and fitting	6.2	0.6%	14		Wood sawn or chipped lengthwise, sl	5.0	0.8%
15	8708	Air conditioning machines, compri	6.1	0.6%	15		Petroleum gases and other gaseous h	4.7	0.8%
16	2711	Insulated (including enamelled or a	5.8	0.5%	16		Milk and cream, concentrated or con	4.6	0.8%
17	8418	Articles for the conveyance or pack	5.8	0.5%	17		Parts of goods of heading 88.01 or	4.6	0.8%
18	8409	Transmission apparatus for radio-te	5.7	0.5%	18		Meat and edible ofal, of the poult	4.4	0.7%
19	2523	Medicaments (excluding goods of hea	5.5	0.5%	19		Wine of fresh grapes, including for	4.0	0.7%
20	8703	Fish, frozen, excluding fish fillet	5.4	0.5%	20		Automatic data processing machines	3.7	0.6%
		Total goods exports	1103.6	100.0%			Total goods exports	598.2	100.0%
		Total of top 5 exports	605.7	55%			Total of top 5 exports	269.4	45.0%
		HHI top 5	0.4				HHI top 5	0.6	
		Total of top 10 exports	649.4	58.8%			Total of top 10 exports	308.0	51.5%
		HHI top 10	0.38				HHI top 10	0.43	
		Total of top 20 exports	710.5	64.4%			Total of top 20 exports	355.2	59.4%

Top 20 imports Seychelles from WORLD ex EU27 in 2019					Top 20 imports Seychelles from WORLD ex EU27 in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
		HHI top 20	0.32				HHI top 20	0.32	

Source: UN Comtrade data

Table 76: Top 20 imports Seychelles from EAC

Top 20 imports Seychelles from EAC in 2019					Top 20 imports Seychelles from EAC in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	7010	Carboys, bottles, flasks, jars, pot	0.8	24.3%	1	7010	Carboys, bottles, flasks, jars, pot	0.9	23.3%
2	2202	Waters, including mineral waters an	0.2	7.1%	2	2710	Petroleum oils and oils obtained fr	0.5	14.1%
3	8544	Insulated (including enamelled or a	0.2	6.2%	3	704	Cabbages, cauliflowers, kohlrabi, k	0.2	5.7%
4	603	Cut flowers and flower buds of a ki	0.2	4.7%	4	8471	Automatic data processing machines	0.2	5.2%
5	9031	Measuring or checking instruments,	0.2	4.5%	5	9403	Other furniture and parts thereof.	0.2	5.2%
6	2106	Food preparations not elsewhere spe	0.1	3.6%	6	8544	Insulated (including enamelled or a	0.2	4.9%
7	1601	Sausages and similar products, of m	0.1	3.5%	7	2009	Fruit juices (including grape must)	0.1	4.0%
8	210	Meat and edible meat offal, salted,	0.1	3.0%	8	210	Meat and edible meat offal, salted,	0.1	2.2%
9	9026	Instruments and apparatus for measu	0.1	2.6%	9	2202	Waters, including mineral waters an	0.1	2.0%
10	708	Leguminous vegetables, shelled or u	0.1	2.6%	10	708	Leguminous vegetables, shelled or u	0.1	1.7%
11	804	Dates, figs, pineapples, avocados,	0.1	2.5%	11	306	Crustaceans, whether in shell or no	0.1	1.6%

Top 20 imports Seychelles from EAC in 2019					Top 20 imports Seychelles from EAC in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1 2	3004	Medicaments (excluding goods of hea	0.1	1.6%	1 2	8301	Padlocks and locks (key, combinatio	0.0	1.3%
1 3	8537	Boards, panels, consoles, desks, ca	0.1	1.6%	1 3	3811	Anti-knock preparations, oxidation	0.0	1.2%
1 4	2710	Petroleum oils and oils obtained fr	0.0	1.4%	1 4	3917	Tubes, pipes and hoses, and fitting	0.0	1.2%
1 5	9405	Lamps and lighting fittings includi	0.0	1.2%	1 5	1601	Sausages and similar products, of m	0.0	1.2%
1 6	810	Other fruit, fresh.	0.0	1.1%	1 6	8413	Pumps for liquids, whether or not f	0.0	1.1%
1 7	9025	Hydrometers and similar floating in	0.0	1.1%	1 7	9018	Instruments and appliances used in	0.0	1.0%
1 8	3006	Pharmaceutical goods specified in N	0.0	1.1%	1 8	706	Carrots, turnips, salad beetroot, s	0.0	1.0%
1 9	8531	Electric sound or visual signalling	0.0	1.1%	1 9	8302	Base metal mountings, fittings and	0.0	1.0%
2 0	1001	Wheat and meslin.	0.0	1.1%	2 0	701	Potatoes, fresh or chilled.	0.0	0.9%
		Total goods exports	3.4	100.0%			Total goods exports	3.8	100.0%
		Total of top 5 exports	1.6	47%			Total of top 5 exports	2.0	54%
		HHI top 5	0.3				HHI top 5	0.3	
		Total of top 10 exports	2.1	62.1%			Total of top 10 exports	2.6	68.3%
		HHI top 10	0.20				HHI top 10	0.19	
		Total of top 20 exports	2.6	76.0%			Total of top 20 exports	3.0	79.7%
		HHI top 20	0.14				HHI top 20	0.14	

Source: UN Comtrade data

Table 77: Top 20 imports Seychelles from SADC

Top 20 imports Seychelles from SADC in 2019					Top 20 imports Seychelles from SADC in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	4407	Wood sawn or chipped lengthwise, sl	6.2	5.5%	1	4819	Cartons, boxes, cases, bags and oth	4.1	5.0%
2	8903	Yachts and other vessels for pleasure	5.3	4.7%	2	303	Fish, frozen, excluding fish fillet	3.5	4.3%
3	2309	Preparations of a kind used in anim	2.7	2.4%	3	2309	Preparations of a kind used in anim	3.2	4.0%
4	4819	Cartons, boxes, cases, bags and oth	2.7	2.3%	4	2204	Wine of fresh grapes, including for	2.9	3.6%
5	303	Fish, frozen, excluding fish fillet	2.6	2.3%	5	8903	Yachts and other vessels for pleasu	2.6	3.1%
6	3402	Organic surface-active agents (othe	2.0	1.7%	6	8539	Electric filament or discharge lamp	2.2	2.7%
7	8901	Cruise ships, excursion boats, ferr	1.5	1.4%	7	1101	Wheat or meslin flour.	2.1	2.5%
8	3923	Articles for the conveyance or pack	1.5	1.3%	8	4407	Wood sawn or chipped lengthwise, sl	1.8	2.3%
9	2204	Wine of fresh grapes, including for	1.5	1.3%	9	3402	Organic surface-active agents (othe	1.6	2.0%
10	8704	Motor vehicles for the transport of	1.5	1.3%	10	8704	Motor vehicles for the transport of	1.4	1.8%

Top 20 imports Seychelles from SADC in 2019					Top 20 imports Seychelles from SADC in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1 1	3917	Tubes, pipes and hoses, and fitting	1.4	1.3%	1 1	9403	Other furniture and parts thereof.	1.3	1.6%
1 2	1905	Bread, pastry, cakes, biscuits and	1.3	1.1%	1 2	3917	Tubes, pipes and hoses, and fitting	1.2	1.5%
1 3	3208	Paints and varnishes (including ena	1.3	1.1%	1 3	7214	Other bars and rods of iron or non-	1.2	1.5%
1 4	8544	Insulated (including enamelled or a	1.3	1.1%	1 4	3923	Articles for the conveyance or pack	1.2	1.4%
1 5	9403	Other furniture and parts thereof.	1.2	1.1%	1 5	8703	Motor cars and other motor vehicles	1.0	1.3%
1 6	3919	Self-adhesive plates, sheets, film,	1.2	1.0%	1 6	3208	Paints and varnishes (including ena	0.9	1.1%
1 7	8413	Pumps for liquids, whether or not f	1.1	1.0%	1 7	4821	Paper or paperboard labels of all k	0.8	1.0%
1 8	4821	Paper or paperboard labels of all k	1.1	1.0%	1 8	3926	Other articles of plastics and arti	0.7	0.9%
1 9	8517	Electrical apparatus for line telep	1.1	1.0%	1 9	8901	Cruise ships, excursion boats, ferr	0.7	0.9%
2 0	8536	Electrical apparatus for switching	1.1	0.9%	2 0	8536	Electrical apparatus for switching	0.7	0.8%
		Total goods exports	113.2	100.0%			Total goods exports	81.5	100.0%

Top 20 imports Seychelles from SADC in 2019					Top 20 imports Seychelles from SADC in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
		Total of top 5 exports	19.5	17%			Total of top 5 exports	16.4	20%
		HHI top 5	0.2				HHI top 5	0.2	
		Total of top 10 exports	27.5	24.3%			Total of top 10 exports	25.5	31.3%
		HHI top 10	0.13				HHI top 10	0.11	
		Total of top 20 exports	39.5	34.9%			Total of top 20 exports	35.3	43.3%
		HHI top 20	0.07				HHI top 20	0.07	

Source: UN Comtrade data

Table 78: Top 20 imports Seychelles from COMESA

Top 20 imports Seychelles from COMESA in 2019					Top 20 imports Seychelles from COMESA in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	4819	Cartons, boxes, cases, bags and oth	2.5	5.0%	1	4819	Cartons, boxes, cases, bags and oth	4.0	9.2%
2	2309	Preparations of a kind used in anim	2.4	4.9%	2	303	Fish, frozen, excluding fish fillet	3.5	8.1%
3	709	Other vegetables, fresh or chilled.	1.7	3.3%	3	2309	Preparations of a kind used in anim	3.2	7.4%
4	805	Citrus fruit, fresh or dried.	1.5	3.1%	4	1101	Wheat or meslin flour.	2.1	4.7%
5	3917	Tubes, pipes and hoses, and fitting	1.0	2.0%	5	8903	Yachts and other vessels for pleasu	1.6	3.8%
6	4823	Other paper, paperboard, cellulose	1.0	2.0%	6	2009	Fruit juices (including grape must)	1.3	2.9%

Top 20 imports Seychelles from COMESA in 2019					Top 20 imports Seychelles from COMESA in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
7	1101	Wheat or meslin flour.	1.0	2.0%	7	3923	Articles for the conveyance or pack	1.0	2.3%
8	8544	Insulated (including enamelled or a	1.0	1.9%	8	7010	Carboys, bottles, flasks, jars, pot	0.9	2.0%
9	4821	Paper or paperboard labels of all k	0.9	1.9%	9	9403	Other furniture and parts thereof.	0.8	1.8%
10	8903	Yachts and other vessels for pleasu	0.9	1.9%	10	3917	Tubes, pipes and hoses, and fitting	0.8	1.7%
11	3923	Articles for the conveyance or pack	0.9	1.8%	11	8703	Motor cars and other motor vehicles	0.7	1.6%
12	9018	Instruments and appliances used in	0.9	1.7%	12	1512	Sunflower-seed, safflower or cotton	0.7	1.6%
13	7010	Carboys, bottles, flasks, jars, pot	0.9	1.7%	13	4821	Paper or paperboard labels of all k	0.7	1.6%
14	3402	Organic surface-active agents (othe	0.7	1.4%	14	2710	Petroleum oils and oils obtained fr	0.6	1.4%
15	8471	Automatic data processing machines	0.7	1.4%	15	4407	Wood sawn or chipped lengthwise, sl	0.6	1.4%
16	4911	Other printed matter, including pri	0.7	1.4%	16	3402	Organic surface-active agents (othe	0.6	1.4%
17	8517	Electrical apparatus for line telep	0.7	1.4%	17	4911	Other printed matter, including pri	0.5	1.1%
18	2202	Waters, including mineral waters an	0.7	1.3%	18	8471	Automatic data processing machines	0.4	1.0%
19	8536	Electrical apparatus for switching	0.6	1.2%	19	4412	Plywood, veneered panels and simila	0.4	0.9%
20	807	Melons (including watermelons) and	0.6	1.2%	20	3506	Prepared glues and other prepared	0.4	0.9%
		Total goods exports	49.5	100.0%			Total goods exports	43.7	100.0%
		Total of top 5 exports	9.1	18%			Total of top 5 exports	14.5	33%
		HHI top 5	0.2				HHI top 5	0.2	

Top 20 imports Seychelles from COMESA in 2019					Top 20 imports Seychelles from COMESA in 2013				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
		Total of top 10 exports	13.9	28.1%			Total of top 10 exports	19.2	43.9%
		HHI top 10	0.12				HHI top 10	0.14	
		Total of top 20 exports	21.2	42.8%			Total of top 20 exports	24.8	56.8%
		HHI top 20	0.06				HHI top 20	0.09	

Source: UN Comtrade data

Zimbabwe

Zimbabwe's goods exports to the EU

Table 79: Top 20 exports, Zimbabwe to EU27, 2009, 2012, 2019 (Eurostat data), trade value in million EUR, HS 2, sorted by 2019 trade value

	2009	2012	2019	CAGR 2009 - 2012	CAGR 2012 - 2019
Total	182.5	393.9	359.3	29.2%	-1.3%
TOBACCO AND MANUFACTURED TOBACCO SUBSTITUTES (1988-2500)	31.5	55.6	104.9	20.8%	9.5%
IRON AND STEEL (1988-2500)	34.9	113.2	99.7	48.1%	-1.8%
EDIBLE FRUIT AND NUTS; PEEL OF CITRUS FRUIT OR MELONS (1988-2500)	9.9	15.2	41.8	15.1%	15.6%
RAW HIDES AND SKINS (OTHER THAN FURSKINS) AND LEATHER (1988-2500)	7.9	14.4	33.4	22.0%	12.8%
SALT; SULPHUR; EARTHS AND STONE; PLASTERING MATERIALS, LIME AND CEMENT(1988-2500)	16.6	16.6	30.0	0.1%	8.8%
EDIBLE VEGETABLES AND CERTAIN ROOTS AND TUBERS (1988-2500)	3.1	5.6	10.2	21.0%	9.1%
SUGARS AND SUGAR CONFECTIONERY (1988-2500)	20.7	93.9	6.2	65.4%	- 32.2%
LIVE TREES AND OTHER PLANTS; BULBS, ROOTS AND THE LIKE; CUT FLOWERS AND ORNAMENTAL FOLIAGE (1988-2500)	15.5	9.2	5.8	-15.9%	-6.4%
ARTICLES OF STONE, PLASTER, CEMENT, ASBESTOS, MICA OR SIMILAR MATERIALS (1988-2500)	0.1	0.9	3.6	120.8%	21.1%
COFFEE, TEA, MATE AND SPICES (1988-2500)	2.7	3.1	2.9	5.0%	-1.0%
ARTICLES OF APPAREL AND CLOTHING ACCESSORIES, NOT KNITTED OR CROCHETED (1988-2500)	1.3	1.2	2.5	-3.0%	10.8%
NATURAL OR CULTURED PEARLS, PRECIOUS OR SEMI-PRECIOUS STONES, PRECIOUS METALS, METALS CLAD WITH PRECIOUS METAL, AND ARTICLES THEREOF; IMITATION JEWELLERY; COIN (1988-2500)	6.7	26.0	1.8	57.1%	- 31.9%
PREPARATIONS OF VEGETABLES, FRUIT, NUTS OR OTHER PARTS OF PLANTS (1988-2500)	0.0	1.9	1.1	316.5%	-7.2%
ORES, SLAG AND ASH (1988-2500)	2.0	N/A	0.9	N/A	N/A
MEAT AND EDIBLE MEAT OFFAL (1988-2500)	1.1	1.0	0.8	-5.6%	-1.8%
WORKS OF ART, COLLECTORS' PIECES AND ANTIQUES (1988-2500)	0.6	0.6	0.6	-1.6%	1.9%
COTTON (1988-2500)	9.9	7.6	0.6	-8.5%	- 30.7%
OIL SEEDS AND OLEAGINOUS FRUITS; MISCELLANEOUS GRAINS, SEEDS AND FRUIT; INDUSTRIAL OR MEDICINAL PLANTS; STRAW AND FODDER (1988-2500)	0.1	0.2	0.5	14.9%	15.1%
ESSENTIAL OILS AND RESINOIDS; PERFUMERY, COSMETIC OR TOILET PREPARATIONS (1988-2500)	N/A	0.0	0.5	N/A	80.2%

	2009	2012	2019	CAGR 2009 - 2012	CAGR 2012 - 2019
NUCLEAR REACTORS, BOILERS, MACHINERY AND MECHANICAL APPLIANCES; PARTS THEREOF (1988-2500)	0.5	0.7	0.3	10.0%	- 11.8%
Share top 5 imports	55%	55%	86%		
Share top 10 imports	78%	83%	94%		
Share top 20 imports	91%	93%	97%		

Source: Eurostat data

Table 80: Top 20 exports, Zimbabwe to EU27, 2009, 2012, 2019 (UN Comtrade data), trade value in million USD, HS 4, sorted by 2019 trade value

2019					2012				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
1	7102	Diamonds, whether or not worked, bu	61.7	86.9%	7202	Ferro-alloys.	59.9	52.8%	603	Cut flowers and flower buds of a ki	181.2	45.6%
2	603	Cut flowers and flower buds of a ki	2.6	3.6%	7102	Diamonds, whether or not worked, bu	47.5	41.9%	2401	Unmanufactured tobacco; tobacco ref	113.9	28.7%
3	4103	Other raw hides and skins (fresh, o	2.3	3.2%	5201	Cotton, not carded or combed.	1.0	0.9%	7202	Ferro-alloys.	24.3	6.1%
4	2615	Niobium, tantalum, vanadium or zirc	0.9	1.2%	9703	Original sculptures and statuary, i	0.7	0.7%	7102	Diamonds, whether or not worked, bu	20.9	5.3%
5	9705	Collections and collectors' pieces	0.8	1.1%	708	Leguminous vegetables shelled or u	0.7	0.6%	5201	Cotton, not carded or combed.	16.5	4.2%
6	9703	Original sculptures and statuary,	0.7	1.0%	4103	Other raw hides and skins (fresh, o	0.6	0.5%	2516	Granite, porphyry, basalt, sandston	11.3	2.8%
7	6203	Men's or boys' suits, ensembles,	0.4	0.6%	9705	Collections and collectors' pieces	0.5	0.4%	4103	Other raw hides and skins (fresh, o	6.0	1.5%

2019					2012				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
8	708	Leguminous vegetables, shelled or u	0.3	0.4%	8207	Interchangeable tools for hand tool	0.3	0.3%	9705	Collections and collectors' pieces	6.0	1.5%
9	901	Coffee, whether or not roasted	0.2	0.3%	304	Fish fillets and other fish meat (w	0.3	0.3%	902	Tea, whether or not flavoured.	3.7	0.9%
10	7113	Articles of jewellery and parts the	0.2	0.2%	7113	Articles of jewellery and parts the	0.3	0.3%	7404	Copper waste and scrap.	1.9	0.5%
11	9027	Instruments and apparatus for physi	0.1	0.2%	8473	Parts and accessories (other than	0.2	0.1%	8413	Pumps for liquids, whether or not f	1.4	0.4%
12	2401	Unmanufactured tobacco; tobacco ref	0.1	0.1%	902	Tea, whether or not flavoured.	0.1	0.1%	7314	Cloth (including endless bands), gr	1.2	0.3%
13	6211	Track suits, ski suits and swimwear	0.1	0.1%	8431	Parts suitable for use solely or pr	0.1	0.1%	8431	Parts suitable for use solely or pr	0.8	0.2%
14	2843	Colloidal precious metals; inorgani	0.1	0.1%	8471	Automatic data processing machines	0.1	0.1%	9403	Other furniture and parts thereof.	0.8	0.2%
15	511	Animal products not elsewhere speci	0.1	0.1%	9022	Apparatus based on the use of X-ray	0.1	0.1%	901	Coffee, whether or not roasted or d	0.7	0.2%
16	9023	Instruments, apparatus and models,	0.1	0.1%	511	Animal products not elsewhere speci	0.1	0.1%	9703	Original sculptures and statuary, i	0.7	0.2%
17	8511	Electrical ignition or starting equ	0.0	0.1%	8503	Parts suitable for use solely or pr	0.1	0.1%	2603	Copper ores and concentrates.	0.7	0.2%
18	6201	Men's or boys' overcoats, car-coats	0.0	0.1%	9403	Other furniture and parts thereof.	0.1	0.1%	2504	Natural graphite.	0.6	0.2%
19	7114	Articles of goldsmiths' or silversm	0.0	0.1%	8413	Pumps for liquids, whether or not f	0.1	0.1%	4104	Tanned or crust hides and skins of	0.4	0.1%

2019					2012				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
20	904	Pepper of the genus Piper; dried or	0.0	0.1%	8202	Hand saws; blades for saws of all k	0.1	0.0%	810	Other fruit, fresh.	0.3	0.1%
		Total goods exports	71.0	100.0%		Total goods exports	113.3	100.0%		Total goods exports	397.1	100.0%
		Total of top 5 exports	68.2	96%			109.8	97%			356.8	90%
		HHI top 5	0.8				0.5				0.4	
		Total of top 10 exports	70.0	99%			111.8	99%			385.6	97%
		HHI top 10	0.78				0.47				0.32	
		Total of top 20 exports	70.7	99.6%			112.7	99.5%			393.2	99.0%
		HHI top 20	0.76				0.46				0.31	

Source: UN Comtrade data

Table 81: Top 20 exports, Zimbabwe from EU27, compound annual growth rate (CAGR), 2012-2019, 2009-2012

	2019	2019	2019	2012	2009	Post tariff elimination	Pre tariff elimination
	Product code	Description	Trade value in million USD	Trade value in million USD	Trade value in million USD	CAGR 2012 - 2019	CAGR 2009 - 2012
1	7102	Diamonds, whether or not worked, bu	61.7	47.5	20.9	3.8%	31.4%
2	603	Cut flowers and flower buds of a ki	2.6	n/a	181.2	n/a	n/a
3	4103	Other raw hides and skins (fresh, o	2.3	0.6	6.0	20.7%	-53.4%
4	2615	Niobium, tantalum, vanadium or zirc	0.9	0.0	0.0	261.5%	29.3%
5	9705	Collections and collectors' pieces	0.8	0.5	6.0	7.4%	-56.7%
6	9703	Original sculptures and statuary, i	0.7	0.7	0.7	-0.3%	2.5%
7	6203	Men's or boys' suits, ensembles, ja	0.4	0.0	0.2	39.2%	-41.1%

	2019	2019	2019	2012	2009	Post tariff elimination	Pre tariff elimination
	Product code	Description	Trade value in million USD	Trade value in million USD	Trade value in million USD	CAGR 2012 - 2019	CAGR 2009 - 2012
8	708	Leguminous vegetables, shelled or u	0.3	0.7	0.1	-11.7%	84.7%
9	901	Coffee, whether or not roasted or d	0.2	n/a	0.7	n/a	n/a
10	7113	Articles of jewellery and parts the	0.2	0.3	n/a	-9.1%	n/a
11	9027	Instruments and apparatus for physi	0.1	n/a	0.0	n/a	n/a
12	2401	Unmanufactured tobacco; tobacco ref	0.1	0.0	113.9	48.0%	-96.1%
13	6211	Track suits, ski suits and swimwear	0.1	n/a	0.0	n/a	n/a
14	2843	Colloidal precious metals; inorgani	0.1	n/a	n/a	n/a	n/a
15	511	Animal products not elsewhere speci	0.1	0.1	n/a	-3.2%	n/a
16	9023	Instruments, apparatus and models,	0.1	n/a	n/a	n/a	n/a
17	8511	Electrical ignition or starting equ	0.0	n/a	0.0	n/a	n/a
18	6201	Men's or boys' overcoats, car-coats	0.0	0.0	0.0	85.4%	-30.7%
19	7114	Articles of goldsmiths' or silversm	0.0	0.0	n/a	11.1%	n/a
20	904	Pepper of the genus Piper; dried or	0.0	n/a	0.1	n/a	n/a
		Total goods exports	71.0	113.3	397.1	-6.5%	-34.2%

Source: UN Comtrade data

Zimbabwe's goods imports from the EU

Table 82: Top 20 imports, Zimbabwe from EU27, 2009, 2012, 2019 (Eurostat data), trade value in million EUR, HS 2, sorted by 2019 trade value

	2009	2017	2019	CAGR 2009 - 2017	CAGR 2017 - 2019
Total	87.3	157.9	150.8	7.7%	-2.3%
NUCLEAR REACTORS, BOILERS, MACHINERY AND MECHANICAL APPLIANCES; PARTS THEREOF (1988-2500)	31.3	45.9	51.9	4.9%	6.3%
PHARMACEUTICAL PRODUCTS (1988-2500)	3.8	22.3	15.2	24.7%	-17.5%
MISCELLANEOUS CHEMICAL PRODUCTS (1988-2500)	1.5	14.9	13.7	33.2%	-4.1%
VEHICLES OTHER THAN RAILWAY OR TRAMWAY ROLLING STOCK, AND PARTS AND ACCESSORIES THEREOF (1988-2500)	3.8	8.9	8.1	11.1%	-4.7%
ELECTRICAL MACHINERY AND EQUIPMENT AND PARTS THEREOF; SOUND RECORDERS AND REPRODUCERS, TELEVISION IMAGE AND SOUND RECORDERS AND REPRODUCERS, AND PARTS AND ACCESSORIES OF SUCH ARTICLES (1988-2500)	22.5	13.9	6.7	-5.9%	-30.7%
PRINTED BOOKS, NEWSPAPERS, PICTURES AND OTHER PRODUCTS OF THE PRINTING INDUSTRY; MANUSCRIPTS, TYPESCRIPTS AND PLANS (1988-2500)	0.1	0.2	4.6	5.3%	387.8%
OPTICAL, PHOTOGRAPHIC, CINEMATOGRAPHIC, MEASURING, CHECKING, PRECISION, MEDICAL OR SURGICAL INSTRUMENTS AND APPARATUS; PARTS AND ACCESSORIES THEREOF (1988-2500)	4.3	8.5	4.5	8.7%	-27.4%
CEREALS (1988-2500)	0.0	1.9	4.4	234.7%	50.8%
AIRCRAFT, SPACECRAFT, AND PARTS THEREOF (1988-2500)	0.1	0.1	4.3	6.1%	589.2%
ESSENTIAL OILS AND RESINOIDS; PERFUMERY, COSMETIC OR TOILET PREPARATIONS (1988-2500)	0.6	1.0	4.2	7.8%	103.2%
PLASTICS AND ARTICLES THEREOF (1988-2500)	0.8	5.1	3.0	26.2%	-22.5%
ARTICLES OF IRON OR STEEL (1988-2500)	0.3	2.8	2.9	33.7%	1.6%
FURNITURE; BEDDING, MATTRESSES, MATTRESS SUPPORTS, CUSHIONS AND SIMILAR STUFFED FURNISHINGS; LAMPS AND LIGHTING FITTINGS, NOT ELSEWHERE SPECIFIED OR INCLUDED; ILLUMINATED SIGNS, ILLUMINATED NAMEPLATES AND THE LIKE; PREFABRICATED BUILDINGS (1988-2500)	0.3	0.9	2.6	15.8%	69.5%
Other products (1988-2500)	2.5	1.1	2.5	-10.3%	51.4%
PREPARATIONS OF CEREALS, FLOUR, STARCH OR MILK; PASTRYCOOKS' PRODUCTS (1988-2500)	1.0	2.0	2.1	9.1%	0.3%
MISCELLANEOUS EDIBLE PREPARATIONS (1988-2500)	2.1	1.8	1.9	-2.1%	4.3%
INORGANIC CHEMICALS; ORGANIC OR INORGANIC COMPOUNDS OF PRECIOUS METALS, OF RARE-EARTH METALS, OF RADIOACTIVE ELEMENTS OR OF ISOTOPES (1988-2500)	1.4	1.0	1.5	-3.5%	23.0%

	2009	2017	2019	CAGR 2009 - 2017	CAGR 2017 - 2019
LIVE TREES AND OTHER PLANTS; BULBS, ROOTS AND THE LIKE; CUT FLOWERS AND ORNAMENTAL FOLIAGE (1988-2500)	0.1	0.1	1.5	7.4%	309.4 %
PAPER AND PAPERBOARD; ARTICLES OF PAPER PULP, OF PAPER OR OF PAPERBOARD (1988-2500)	1.1	3.6	1.3	15.7%	-38.9%
DAIRY PRODUCE; BIRDS' EGGS; NATURAL HONEY; EDIBLE PRODUCTS OF ANIMAL ORIGIN, NOT ELSEWHERE SPECIFIED OR INCLUDED (1988-2500)	0.7	5.0	1.0	27.2%	-54.7%
Share top 5 exports	72%	67%	63%		
Share top 10 exports	78%	75%	78%		
Share top 20 exports	90%	89%	91%		

Source: Eurostat

Table 83: Top 20 imports, Zimbabwe from EU27, 2009, 2012, 2019 (UN Comtrade data), trade value in million USD, HS 4, sorted by 2019 trade value

2019					2017				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
1	3004	Medicaments (excluding goods of hea	38.1	13.4%	1001	Wheat and meslin.	29.1	9.7%	1001	Wheat and meslin.	14.3	7.5%
2	8704	Motor vehicles for the transport of	26.6	9.4%	3822	Diagnostic or laboratory reagents o	14.5	4.8%	3004	Medicaments (excluding goods of hea	14.1	7.4%
3	1001	Wheat and meslin.	19.0	6.7%	8471	Automatic data processing machines	13.0	4.3%	8517	Electrical apparatus for line telep	13.1	6.9%
4	8701	Tractors (other than tractors of he	11.4	4.0%	8704	Motor vehicles for the transport of	11.3	3.8%	2710	Petroleum oils and oils obtained fr	10.3	5.4%
5	8431	Parts suitable for use solely or pr	10.8	3.8%	3004	Medicaments (excluding goods of hea	9.2	3.1%	1006	Rice.	9.0	4.7%
6	3002	Human blood; animal blood prepared	10.2	3.6%	8703	Motor cars and other motor vehicles	8.3	2.8%	8703	Motor cars and other motor vehicles	8.3	4.3%

2019					2017				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
7	2710	Petroleum oils and oils obtained fr	9.4	3.3%	8431	Parts suitable for use solely or pr	7.6	2.5%	8704	Motor vehicles for the transport of	4.8	2.5%
8	3808	Insecticides, rodenticides, fungici	7.2	2.5%	3002	Human blood; animal blood prepared	7.4	2.5%	8431	Parts suitable for use solely or pr	4.2	2.2%
9	8471	Automatic data processing machines	6.8	2.4%	9018	Instruments and appliances used in	7.1	2.4%	3002	Human blood; animal blood prepared	4.0	2.1%
10	3822	Diagnostic or laboratory reagents o	6.8	2.4%	8524	Records, tapes and other recorded m	7.0	2.3%	8471	Automatic data processing machines	4.0	2.1%
11	3302	Mixtures of odoriferous substances	5.8	2.0%	3003	Medicaments (excluding goods of hea	6.1	2.0%	8421	Centrifuges, including centrifugal	3.9	2.0%
12	9018	Instruments and appliances used in	5.5	1.9%	8429	Self-propelled bulldozers, angledoz	5.2	1.7%	3003	Medicaments (excluding goods of hea	3.9	2.0%
13	8708	Parts and accessories of the motor	4.4	1.6%	2711	Petroleum gases and other gaseous h	4.7	1.6%	8478	Machinery for preparing or making u	3.8	2.0%
14	402	Milk and cream, concentrated or con	3.5	1.3%	8708	Parts and accessories of the motor	4.1	1.4%	8708	Parts and accessories of the motor	3.6	1.9%
15	8716	Trailers and semi-trailers; other v	3.4	1.2%	3105	Mineral or chemical fertilisers con	4.0	1.3%	8429	Self-propelled bulldozers, angledoz	3.1	1.6%
16	8437	Machines for cleaning, sorting or g	3.2	1.1%	8517	Electrical apparatus for line telep	3.2	1.1%	713	Dried leguminous vegetables, shelle	3.0	1.6%
17	3006	Pharmaceutical goods specified in N	3.2	1.1%	8413	Pumps for liquids, whether or not f	2.7	0.9%	9018	Instruments and appliances used in	3.0	1.6%

2019					2017				2009			
	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade	Product code	Description	Trade value in million USD	Share in total trade
18	8429	Self-propelled bulldozers, angledoz	3.0	1.1%	3907	Polyacetals, other polyethers and e	2.5	0.8%	8430	Other moving, grading, levelling, s	3.0	1.6%
19	8703	Motor cars and other motor vehicles	2.8	1.0%	8701	Tractors (other than tractors of he	2.4	0.8%	1515	Other fixed vegetable fats and oils	2.6	1.4%
20	8477	Machinery for working rubber or pla	2.6	0.9%	8541	Diodes, transistors and similar sem	2.2	0.7%	8443	Printing machinery used for printin	2.4	1.3%
		Total goods imports from EU27	283.3	100.0%		Total goods imports from EU27	300.1	100.0%		Total goods imports from EU27	191.0	100.0%
		Total of top 5 exports	105.9	37%			77.2	26%			60.9	32%
		HHI top 5	0.2				0.2				0.2	
		Total of top 10 exports	146.3	52%			114.6	38%			86.3	45%
		HHI top 10	0.14				0.13				0.12	
		Total of top 20 exports	183.7	64.8%			151.9	50.6%			118.6	62.1%
		HHI top 20	0.10				0.08				0.07	

Source: UN Comtrade data

Table 84: Top 20 imports, Zimbabwe from EU27, compound annual growth rate (CAGR), 2012-2019, 2009-2012

	2019	2019	2019	2017	2009	Post tariff elimination	Pre tariff elimination
	Product code	Description	Trade value in million USD	Trade value in million USD	Trade value in million USD	CAGR 2017 - 2019	CAGR 2009 - 2017
1	3004	Medicaments (excluding goods of hea	38.1	9.2	14.1	103.0%	-5.2%
2	8704	Motor vehicles for the transport of	26.6	11.3	4.8	53.2%	11.3%

	2019	2019	2019	2017	2009	Post tariff elimination	Pre tariff elimination
	Product code	Description	Trade value in million USD	Trade value in million USD	Trade value in million USD	CAGR 2017 - 2019	CAGR 2009 - 2017
3	1001	Wheat and meslin.	19.0	29.1	14.3	-19.2%	9.3%
4	8701	Tractors (other than tractors of he	11.4	2.4	1.5	116.0%	6.2%
5	8431	Parts suitable for use solely or pr	10.8	7.6	4.2	19.3%	7.6%
6	3002	Human blood; animal blood prepared	10.2	7.4	4.0	16.8%	8.0%
7	2710	Petroleum oils and oils obtained fr	9.4	60.4	10.3	-60.6%	24.7%
8	3808	Insecticides, rodenticides, fungici	7.2	1.7	0.2	105.5%	28.8%
9	8471	Automatic data processing machines	6.8	13.0	4.0	-27.4%	15.8%
10	3822	Diagnostic or laboratory reagents o	6.8	14.5	1.5	-31.6%	33.4%
11	3302	Mixtures of odoriferous substances	5.8	0.7	0.2	185.6%	18.7%
12	9018	Instruments and appliances used in	5.5	7.1	3.0	-12.2%	11.4%
13	8708	Parts and accessories of the motor	4.4	4.1	3.6	4.3%	1.7%
14	402	Milk and cream, concentrated or con	3.5	0.1	0.2	608.6%	-10.0%
15	8716	Trailers and semi-trailers; other v	3.4	0.5	0.3	152.3%	6.4%
16	8437	Machines for cleaning, sorting or g	3.2	0.2	0.1	333.0%	8.8%
17	3006	Pharmaceutical goods specified in N	3.2	1.4	1.5	49.9%	-0.5%
18	8429	Self-propelled bulldozers, angledoz	3.0	5.2	3.1	-24.6%	6.7%
19	8703	Motor cars and other motor vehicles	2.8	8.3	8.3	-41.5%	0.0%
20	8477	Machinery for working rubber or pla	2.6	0.2	0.3	316.1%	-8.5%
		Total goods imports from EU27	283.3	300.1	191.0	-0.8%	16.3%

Source: UN Comtrade data

Zimbabwe's goods exports to non-EU jurisdictions

Table 85: Top 20 exports Zimbabwe to WORLD ex EU27

Top 20 exports Zimbabwe to WORLD ex EU27 in 2019					Top 20 exports Zimbabwe to WORLD ex EU27 in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	2401	Gold (including gold plated with pl	1063.9	25.3%	1		Unmanufactured tobacco; tobacco ref	741.8	19.4%
2	7102	Unmanufactured tobacco; tobacco ref	782.9	18.6%	2		Diamonds, whether or not worked, bu	624.9	16.3%
3	7108	Nickel ores and concentrates.	737.1	17.5%	3		Gold (including gold plated with pl	362.4	9.5%
4	2604	Nickel mattes, nickel oxide sinters	488.5	11.6%	4		Nickel ores and concentrates.	352.5	9.2%
5	7501	Ferro-alloys.	228.0	5.4%	5		Nickel mattes, nickel oxide sinters	218.0	5.7%
6	5201	Articles of jewellery and parts the	160.5	3.8%	6		Cotton, not carded or combed.	144.8	3.8%
7	7202	Cane or beet sugar and chemically p	60.8	1.4%	7		Ferro-alloys.	102.7	2.7%
8	1701	Platinum, unwrought or in semi-manu	60.1	1.4%	8		Platinum, unwrought or in semi-manu	80.2	2.1%
9	7110	Diamonds, whether or not worked, bu	54.8	1.3%	9		Cane or beet sugar and chemically p	38.4	1.0%
10	2402	Chromium ores and concentrates.	45.1	1.1%	10		Cigars, cheroots, cigarillos and ci	34.4	0.9%
11	2704	Cotton, not carded or combed.	36.9	0.9%	11		Coke and semi-coke of coal, of lign	22.6	0.6%
12	902	Other manufactured tobacco and manu	30.1	0.7%	12		Other raw hides and skins (fresh, o	17.6	0.5%
13	4103	Other raw hides and skins (fresh, o	28.5	0.7%	13		Tea, whether or not flavoured.	17.3	0.5%
14	2306	Coke and semi-coke of coal, of lign	26.7	0.6%	14		Oil-cake and other solid residues,	16.2	0.4%

Top 20 exports Zimbabwe to WORLD ex EU27 in 2019					Top 20 exports Zimbabwe to WORLD ex EU27 in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
15	2516	Tea, whether or not flavoured.	21.1	0.5%	15		Granite, porphyry, basalt, sandston	14.9	0.4%
16	8802	Other nuts, fresh or dried, whether	20.9	0.5%	16		Other aircraft (for example, helico	13.0	0.3%
17	2523	Mineral substances not elsewhere sp	20.3	0.5%	17		Portland cement, aluminous cement,	11.4	0.3%
18	5205	Granite, porphyry, basalt, sandston	19.5	0.5%	18		Cotton yarn (other than sewing thre	10.9	0.3%
19	2403	Electrical energy. (optional headin	17.0	0.4%	19		Other manufactured tobacco and manu	10.5	0.3%
20	9705	Cigars, cheroots, cigarillos and ci	15.4	0.4%	20		Collections and collectors' pieces	9.4	0.2%
		Total goods exports	4206.9	100.0%			Total goods exports	3831.4	100.0%
		Total of top 5 exports	3300.4	78%			Total of top 5 exports	2299.5	60.0%
		HHI top 5	0.2				HHI top 5	0.2	
		Total of top 10 exports	3681.8	87.5%			Total of top 10 exports	2700.0	70.5%
		HHI top 10	0.19				HHI top 10	0.18	
		Total of top 20 exports	3918.1	93.1%			Total of top 20 exports	2843.8	74.2%
		HHI top 20	0.17				HHI top 20	0.16	

Source: UN Comtrade data

Table 86: Top 20 exports Zimbabwe to EAC

Top 20 exports Zimbabwe to EAC in 2019					Top 20 exports Zimbabwe to EAC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	1701	Cane or beet sugar and chemically p	35.1	98.8%	1	407	Birds' eggs, in shell, fresh, prese	0.3	23.5%

Top 20 exports Zimbabwe to EAC in 2019					Top 20 exports Zimbabwe to EAC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
2	8414	Air or vacuum pumps, air or other g	0.1	0.2%	2	105	Live poultry, that is to say, fowls	0.1	11.6%
3	8206	Tools of two or more of the heading	0.1	0.2%	3	7203	Ferrous products obtained by direct	0.1	11.2%
4	7113	Articles of jewellery and parts the	0.0	0.1%	4	3302	Mixtures of odoriferous substances	0.1	10.2%
5	1107	Malt, whether or not roasted.	0.0	0.1%	5	4403	Wood in the rough, whether or not s	0.1	9.0%
6	6309	Worn clothing and other worn articl	0.0	0.1%	6	4203	Articles of apparel and clothing ac	0.1	8.8%
7	8301	Padlocks and locks (key, combinatio	0.0	0.1%	7	4803	Toilet or facial tissue stock, towe	0.1	5.0%
8	2712	Petroleum jelly; paraffin wax, micr	0.0	0.0%	8	3923	Articles for the conveyance or pack	0.0	3.2%
9	4011	New pneumatic tyres, of rubber.	0.0	0.0%	9	3602	Prepared explosives, other than pro	0.0	3.1%
10	3304	Beauty or make-up preparations and	0.0	0.0%	10	8430	Other moving, grading, levelling, s	0.0	2.7%
11	1005	Maize (corn).	0.0	0.0%	11	713	Dried leguminous vegetables, shelle	0.0	1.8%
12	1209	Seeds, fruit and spores, of a kind	0.0	0.0%	12	4902	Newspapers, journals and periodical	0.0	1.3%
13	8413	Pumps for liquids, whether or not f	0.0	0.0%	13	5609	Articles of yarn, strip or the like	0.0	1.1%
14	3303	Perfumes and toilet waters.	0.0	0.0%	14	6203	Men's or boys' suits, ensembles, ja	0.0	1.0%
15	8474	Machinery for sorting, screening, s	0.0	0.0%	15	3503	Gelatin (including gelatin in recta	0.0	1.0%
16	1201	Soya beans, whether or not broken.	0.0	0.0%	16	6309	Worn clothing and other worn articl	0.0	0.9%

Top 20 exports Zimbabwe to EAC in 2019					Top 20 exports Zimbabwe to EAC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
17	9703	Original sculptures and statuary, i	0.0	0.0%	17	5208	Woven fabrics of cotton, containing	0.0	0.9%
18	2009	Fruit juices (including grape must)	0.0	0.0%	18	6205	Men's or boys' shirts.	0.0	0.8%
19	7309	Reservoirs, tanks, vats and similar	0.0	0.0%	19	1209	Seeds, fruit and spores, of a kind	0.0	0.5%
20	8609	Containers (including containers fo	0.0	0.0%	20	7419	Other articles of copper.	0.0	0.4%
		Total goods exports	35.5	100.0%			Total goods exports	1.1	100.0%
		Total of top 5 exports	35.3	99%			Total of top 5 exports	0.7	66%
		HHI top 5	1.0				HHI top 5	0.2	
		Total of top 10 exports	35.4	99.7%			Total of top 10 exports	1.0	88.3%
		HHI top 10	0.98				HHI top 10	0.14	
		Total of top 20 exports	35.5	99.9%			Total of top 20 exports	1.1	98.1%
		HHI top 20	0.98				HHI top 20	0.12	

Source: UN Comtrade data

Table 87: Top 20 exports Zimbabwe to SADC

Top 20 exports Zimbabwe to SADC in 2019					Top 20 exports Zimbabwe to SADC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	2401	Unmanufactured tobacco; tobacco ref	780.1	29.9%	1	2401	Unmanufactured tobacco; tobacco ref	777.5	25.1%
2	2604	Nickel ores and concentrates.	536.2	20.6%	2	7108	Gold (including gold plated with pl	624.9	20.2%
3	7108	Gold (including gold plated with pl	411.7	15.8%	3	2604	Nickel ores and concentrates.	356.8	11.5%

Top 20 exports Zimbabwe to SADC in 2019					Top 20 exports Zimbabwe to SADC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
4	7202	Ferro-alloys.	226.8	8.7%	4	7501	Nickel mattes, nickel oxide sinters	352.5	11.4%
5	7501	Nickel mattes, nickel oxide sinters	61.5	2.4%	5	5201	Cotton, not carded or combed.	211.9	6.8%
6	7110	Platinum, unwrought or in semi-manu	60.1	2.3%	6	7110	Platinum, unwrought or in semi-manu	144.8	4.7%
7	5201	Cotton, not carded or combed.	36.9	1.4%	7	1701	Cane or beet sugar and chemically p	102.7	3.3%
8	2610	Chromium ores and concentrates.	31.9	1.2%	8	2402	Cigars, cheroots, cigarillos and ci	38.0	1.2%
9	2403	Other manufactured tobacco and manu	30.0	1.2%	9	7202	Ferro-alloys.	37.8	1.2%
10	7113	Articles of jewellery and parts the	27.3	1.0%	10	2704	Coke and semi-coke of coal, of lign	34.4	1.1%
11	1701	Cane or beet sugar and chemically p	25.6	1.0%	11	4103	Other raw hides and skins (fresh, o	22.1	0.7%
12	4103	Other raw hides and skins (fresh, o	25.3	1.0%	12	7102	Diamonds, whether or not worked, bu	18.2	0.6%
13	902	Tea, whether or not flavoured.	21.1	0.8%	13	902	Tea, whether or not flavoured.	17.6	0.6%
14	802	Other nuts, fresh or dried, whether	20.3	0.8%	14	2516	Granite, porphyry, basalt, sandston	16.2	0.5%
15	2530	Mineral substances not elsewhere sp	20.3	0.8%	15	2306	Oil-cake and other solid residues,	16.1	0.5%
16	2516	Granite, porphyry, basalt, sandston	19.5	0.7%	16	8802	Other aircraft (for example, helico	14.9	0.5%

Top 20 exports Zimbabwe to SADC in 2019					Top 20 exports Zimbabwe to SADC in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
17	2402	Cigars, cheroots, cigarillos and ci	15.3	0.6%	17	2523	Portland cement, aluminous cement,	13.0	0.4%
18	8406	Steam turbines and other vapour tur	14.2	0.5%	18	5205	Cotton yarn (other than sewing thre	11.4	0.4%
19	2716	Electrical energy. (optional headin	10.0	0.4%	19	2403	Other manufactured tobacco and manu	10.3	0.3%
20	8802	Other aircraft (for example, helico	9.6	0.4%	20	4011	New pneumatic tyres, of rubber.	9.3	0.3%
		Total goods exports	2607.4	100.0%			Total goods exports	3093.0	100.0%
		Total of top 5 exports	2016.2	77%			Total of top 5 exports	2323.5	75%
		HHI top 5	0.3				HHI top 5	0.2	
		Total of top 10 exports	2202.4	84.5%			Total of top 10 exports	2681.3	86.7%
		HHI top 10	0.23				HHI top 10	0.18	
		Total of top 20 exports	2383.5	91.4%			Total of top 20 exports	2830.2	91.5%
		HHI top 20	0.20				HHI top 20	0.17	

Source: UN Comtrade data

Table 88: Top 20 exports Zimbabwe to COMESA

Top 20 exports Zimbabwe to COMESA in 2019					Top 20 exports Zimbabwe to COMESA in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	1701	Cane or beet sugar and chemically p	35.6	27.7%	1	2704	Coke and semi-coke of coal, of lign	22.4	20.1%
2	7113	Articles of jewellery and parts the	27.3	21.3%	2	2402	Cigars, cheroots, cigarillos and ci	7.3	6.6%

Top 20 exports Zimbabwe to COMESA in 2019					Top 20 exports Zimbabwe to COMESA in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
3	303	Fish, frozen, excluding fish fillet	5.4	4.2%	3	303	Fish, frozen, excluding fish fillet	6.1	5.4%
4	4403	Wood in the rough, whether or not s	3.6	2.8%	4	4403	Wood in the rough, whether or not s	4.1	3.7%
5	3923	Articles for the conveyance or pack	3.4	2.7%	5	4819	Cartons, boxes, cases, bags and oth	3.4	3.0%
6	8507	Electric accumulators, including se	2.9	2.2%	6	8507	Electric accumulators, including se	3.2	2.9%
7	3105	Mineral or chemical fertilisers con	2.7	2.1%	7	9403	Other furniture and parts thereof.	2.8	2.5%
8	2520	Gypsum; anhydrite; plasters (consis	2.6	2.0%	8	1517	Margarine; edible mixtures or prepa	2.8	2.5%
9	4411	Fibreboard of wood or other ligneou	2.0	1.6%	9	3923	Articles for the conveyance or pack	2.7	2.4%
10	2202	Waters, including mineral waters an	1.8	1.4%	10	8432	Agricultural, horticultural or fore	2.5	2.2%
11	8516	Electric instantaneous or storage w	1.8	1.4%	11	2701	Coal; briquettes, ovoids and simila	1.9	1.7%
12	1005	Maize (corn).	1.7	1.3%	12	9401	Seats (other than those of heading	1.8	1.6%
13	4819	Cartons, boxes, cases, bags and oth	1.7	1.3%	13	8704	Motor vehicles for the transport of	1.8	1.6%
14	2403	Other manufactured tobacco and manu	1.5	1.2%	14	1512	Sunflower-seed, safflower or cotton	1.8	1.6%
15	2401	Unmanufactured tobacco; tobacco ref	1.5	1.1%	15	2523	Portland cement, aluminous cement,	1.7	1.5%
16	2009	Fruit juices (including grape must)	1.4	1.1%	16	2207	Undenatured ethyl alcohol of an alc	1.7	1.5%
17	3402	Organic surface-active agents (othe	1.3	1.0%	17	2208	Undenatured ethyl alcohol of an alc	1.6	1.4%

Top 20 exports Zimbabwe to COMESA in 2019					Top 20 exports Zimbabwe to COMESA in 2012				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
18	7202	Ferro-alloys.	1.2	0.9%	18	7308	Structures (excluding prefabricated	1.5	1.4%
19	1905	Bread, pastry, cakes, biscuits and	1.2	0.9%	19	8544	Insulated (including enamelled or a	1.4	1.3%
20	8418	Refrigerators, freezers and other r	1.1	0.8%	20	902	Tea, whether or not flavoured.	1.4	1.2%
		Total goods exports	128.4	100.0%			Total goods exports	111.6	100.0%
		Total of top 5 exports	75.3	59%			Total of top 5 exports	43.3	39%
		HHI top 5	0.4				HHI top 5	0.3	
		Total of top 10 exports	87.3	68.0%			Total of top 10 exports	57.2	51.3%
		HHI top 10	0.28				HHI top 10	0.20	
		Total of top 20 exports	101.5	79.1%			Total of top 20 exports	74.0	66.3%
		HHI top 20	0.21				HHI top 20	0.13	

Source: UN Comtrade data

Zimbabwe's goods imports from non-EU jurisdictions

Table 89: Top 20 imports Zimbabwe from WORLD ex EU27

Top 20 imports Zimbabwe from WORLD ex EU27 in 2019					Top 20 imports Zimbabwe from WORLD ex EU27 in 2017				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	2710	Petroleum oils and oils obtained fr	1303.1	29.2%	1		Petroleum oils and oils obtained fr	1205.7	26.0%
2	2716	Medicaments (excluding goods of hea	125.1	2.8%	2		Electrical energy. (optional headin	178.1	3.8%
3	3004	Motor vehicles for the transport of	114.5	2.6%	3		Motor cars and other motor vehicles	117.0	2.5%
4	8703	Mineral or chemical fertilisers, ni	111.4	2.5%	4		Medicaments (excluding goods of health	117.0	2.5%
5	1005	Electrical energy. (optional headin	94.2	2.1%	5		Maize (corn).	116.7	2.5%
6	8517	Insecticides, rodenticides, fungici	78.2	1.8%	6		Electrical apparatus for line telep	111.6	2.4%
7	8704	Tractors (other than tractors of he	72.7	1.6%	7		Soya-bean oil and its fractions, wh	102.3	2.2%
8	1507	Soya-bean oil and its fractions, wh	72.2	1.6%	8		Rice.	98.8	2.1%
9	1006	Self-propelled bulldozers, angledoz	58.2	1.3%	9		Mineral or chemical fertilisers, ni	97.0	2.1%
10	3102	Machinery for sorting, screening, s	54.2	1.2%	10		Motor vehicles for the transport of	96.5	2.1%
11	3105	Rice.	50.3	1.1%	11		Mineral or chemical fertilisers con	59.6	1.3%
12	3808	Mineral or chemical fertilisers con	47.7	1.1%	12		Insecticides, rodenticides, fungici	59.4	1.3%
13	8471	Motor cars and other motor vehicles	44.1	1.0%	13		Wheat and meslin.	47.3	1.0%
14	8429	New pneumatic tyres, of rubber.	40.3	0.9%	14		Automatic data processing machines	45.6	1.0%

Top 20 imports Zimbabwe from WORLD ex EU27 in 2019					Top 20 imports Zimbabwe from WORLD ex EU27 in 2017				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
15	4011	Automatic data processing machines	37.6	0.8%	15		New pneumatic tyres, of rubber.	41.6	0.9%
16	8701	Mineral or chemical fertilisers,	35.3	0.8%	16		Hydraulic turbines, water wheels, a	37.7	0.8%
17	8431	Flat-rolled products of iron or non	34.8	0.8%	17		Mineral or chemical fertilisers, po	35.9	0.8%
18	3104	Petroleum gases and other gaseous h	34.4	0.8%	18		Tractors (other than tractors of he	33.3	0.7%
19	3901	Polymers of ethylene, in primary fo	33.5	0.8%	19		Flat-rolled products of iron or non	33.0	0.7%
20	8410	Parts suitable for use solely or pr	33.1	0.7%	20		Self-propelled bulldozers, angledoz	32.1	0.7%
		Total goods exports	4460.7	100.0%			Total goods exports	4637.2	100.0%
		Total of top 5 exports	1748.3	39%			Total of top 5 exports	1734.5	37.4%
		HHI top 5	0.6				HHI top 5	0.5	
		Total of top 10 exports	2083.8	46.7%			Total of top 10 exports	2240.7	48.3%
		HHI top 10	0.41				HHI top 10	0.31	
		Total of top 20 exports	2474.8	55.5%			Total of top 20 exports	2666.1	57.5%
		HHI top 20	0.29				HHI top 20	0.22	

Source: UN Comtrade data

Table 90: Top 20 imports Zimbabwe from EAC

Top 20 imports Zimbabwe from EAC in 2019					Top 20 imports Zimbabwe from EAC in 2017				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	1005	Maize (corn).	7.0	31.0%	1	3401	Soap; organic surface-active produc	5.1	24.3%

Top 20 imports Zimbabwe from EAC in 2019					Top 20 imports Zimbabwe from EAC in 2017				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
2	2401	Unmanufactured tobacco; tobacco ref	1.9	8.6%	2	2401	Unmanufactured tobacco; tobacco ref	3.7	17.8%
3	6305	Sacks and bags, of a kind used for	1.6	7.2%	3	6305	Sacks and bags, of a kind used for	2.1	10.0%
4	3004	Medicaments (excluding goods of hea	1.4	6.4%	4	2103	Sauces and preparations therefor; m	1.5	7.1%
5	7010	Carboys, bottles, flasks, jars, pot	1.4	6.2%	5	3808	Insecticides, rodenticides, fungici	1.2	5.8%
6	8701	Tractors (other than tractors of he	1.1	4.9%	6	1006	Rice.	1.1	5.3%
7	3920	Other plates, sheets, film, foil an	1.1	4.9%	7	1517	Margarine; edible mixtures or prepa	0.6	3.1%
8	2103	Sauces and preparations therefor; m	1.1	4.8%	8	8704	Motor vehicles for the transport of	0.6	2.8%
9	2009	Fruit juices (including grape must)	0.8	3.5%	9	6704	Wigs, false beards, eyebrows and ey	0.4	2.1%
10	6704	Wigs, false beards, eyebrows and ey	0.7	3.3%	10	8471	Automatic data processing machines	0.3	1.5%
11	3808	Insecticides, rodenticides, fungici	0.6	2.5%	11	7010	Carboys, bottles, flasks, jars, pot	0.3	1.4%
12	3304	Beauty or make-up preparations and	0.5	2.2%	12	8703	Motor cars and other motor vehicles	0.3	1.2%
13	8704	Motor vehicles for the transport of	0.5	2.1%	13	3921	Other plates, sheets, film, foil an	0.2	1.2%
14	3923	Articles for the conveyance or pack	0.4	2.0%	14	3304	Beauty or make-up preparations and	0.2	1.0%
15	1517	Margarine; edible mixtures or prepa	0.2	1.0%	15	5208	Woven fabrics of cotton, containing	0.2	0.9%
16	8523	Prepared unrecorded media for sound	0.2	0.8%	16	8309	Stoppers, caps and lids (including	0.2	0.9%

Top 20 imports Zimbabwe from EAC in 2019					Top 20 imports Zimbabwe from EAC in 2017				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
17	8802	Other aircraft (for example, helico	0.2	0.7%	17	8507	Electric accumulators, including se	0.2	0.8%
18	3002	Human blood; animal blood prepared	0.2	0.7%	18	5209	Woven fabrics of cotton, containing	0.2	0.8%
19	8432	Agricultural, horticultural or fore	0.2	0.7%	19	3002	Human blood; animal blood prepared	0.2	0.7%
20	3405	Polishes and creams, for footwear,	0.1	0.6%	20	3924	Tableware, kitchenware, other houseware	0.1	0.7%
		Total goods exports	22.5	100.0%			Total goods exports	20.9	100.0%
		Total of top 5 exports	13.4	59%			Total of top 5 exports	13.6	65%
		HHI top 5	0.3				HHI top 5	0.3	
		Total of top 10 exports	18.2	80.7%			Total of top 10 exports	16.7	79.8%
		HHI top 10	0.19				HHI top 10	0.18	
		Total of top 20 exports	21.2	94.0%			Total of top 20 exports	18.7	89.6%
		HHI top 20	0.15				HHI top 20	0.14	

Source: UN Comtrade data

Table 91: Top 20 imports Zimbabwe from SADC

Top 20 imports Zimbabwe from SADC in 2019					Top 20 imports Zimbabwe from SADC in 2017				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	2710	Petroleum oils and oils obtained fr	100.4	4.5%	1	2716	Electrical energy. (optional headin	176.8	7.2%
2	2716	Electrical energy. (optional headin	88.0	3.9%	2	2710	Petroleum oils and oils obtained fr	114.3	4.6%
3	3102	Mineral or chemical fertilisers, ni	72.0	3.2%	3	1507	Soya-bean oil and its fractions, wh	92.0	3.7%

Top 20 imports Zimbabwe from SADC in 2019					Top 20 imports Zimbabwe from SADC in 2017				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
4	1507	Soya-bean oil and its fractions, wh	58.4	2.6%	4	1005	Maize (corn).	84.1	3.4%
5	8704	Motor vehicles for the transport of	54.7	2.4%	5	3102	Mineral or chemical fertilisers, ni	67.8	2.8%
6	3808	Insecticides, rodenticides, fungici	52.2	2.3%	6	8704	Motor vehicles for the transport of	51.0	2.1%
7	3004	Medicaments (excluding goods of hea	50.9	2.3%	7	3004	Medicaments (excluding goods of hea	51.0	2.1%
8	8429	Self-propelled bulldozers, angledoz	42.9	1.9%	8	3105	Mineral or chemical fertilisers con	47.3	1.9%
9	8701	Tractors (other than tractors of he	41.3	1.8%	9	8703	Motor cars and other motor vehicles	34.2	1.4%
10	2711	Petroleum gases and other gaseous h	34.4	1.5%	10	3808	Insecticides, rodenticides, fungici	34.1	1.4%
11	3105	Mineral or chemical fertilisers con	33.8	1.5%	11	7210	Flat-rolled products of iron or non	30.8	1.3%
12	3901	Polymers of ethylene, in primary fo	29.9	1.3%	12	3901	Polymers of ethylene, in primary fo	29.6	1.2%
13	8431	Parts suitable for use solely or pr	29.9	1.3%	13	1201	Soya beans, whether or not broken.	29.5	1.2%
14	7210	Flat-rolled products of iron or non	29.6	1.3%	14	8701	Tractors (other than tractors of he	27.5	1.1%
15	3104	Mineral or chemical fertilisers, po	29.2	1.3%	15	8471	Automatic data processing machines	26.3	1.1%
16	8471	Automatic data processing machines	26.2	1.2%	16	1006	Rice.	25.6	1.0%
17	8474	Machinery for sorting, screening, s	25.7	1.1%	17	8429	Self-propelled bulldozers, angledoz	25.1	1.0%
18	1005	Maize (corn).	25.7	1.1%	18	3402	Organic surface-active agents (othe	24.8	1.0%

Top 20 imports Zimbabwe from SADC in 2019					Top 20 imports Zimbabwe from SADC in 2017				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
19	8424	Mechanical appliances (whether or n	25.1	1.1%	19	3104	Mineral or chemical fertilisers, po	24.7	1.0%
20	2309	Preparations of a kind used in anim	22.7	1.0%	20	4011	New pneumatic tyres, of rubber.	23.8	1.0%
		Total goods exports	2250.3	100.0%			Total goods exports	2460.0	100.0%
		Total of top 5 exports	373.5	17%			Total of top 5 exports	534.9	22%
		HHI top 5	0.2				HHI top 5	0.2	
		Total of top 10 exports	595.3	26.5%			Total of top 10 exports	752.5	30.6%
		HHI top 10	0.11				HHI top 10	0.13	
		Total of top 20 exports	873.1	38.8%			Total of top 20 exports	1020.2	41.5%
		HHI top 20	0.06				HHI top 20	0.08	

Source: UN Comtrade data

Table 92: Top 20 imports Zimbabwe from COMESA

Top 20 imports Zimbabwe from COMESA in 2019					Top 20 imports Zimbabwe from COMESA in 2017				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
1	3102	Mineral or chemical fertilisers, ni	37.8	13.4%	1	1201	Soya beans, whether or not broken.	29.5	9.7%
2	3105	Mineral or chemical fertilisers con	18.6	6.6%	2	3102	Mineral or chemical fertilisers, ni	24.3	8.0%
3	2523	Portland cement, aluminous cement,	13.1	4.6%	3	3302	Mixtures of odoriferous substances	18.5	6.1%
4	3302	Mixtures of odoriferous substances	12.1	4.3%	4	3105	Mineral or chemical fertilisers con	17.1	5.6%
5	2304	Oil-cake and other solid residues,	11.9	4.2%	5	2202	Waters, including mineral waters an	15.2	5.0%

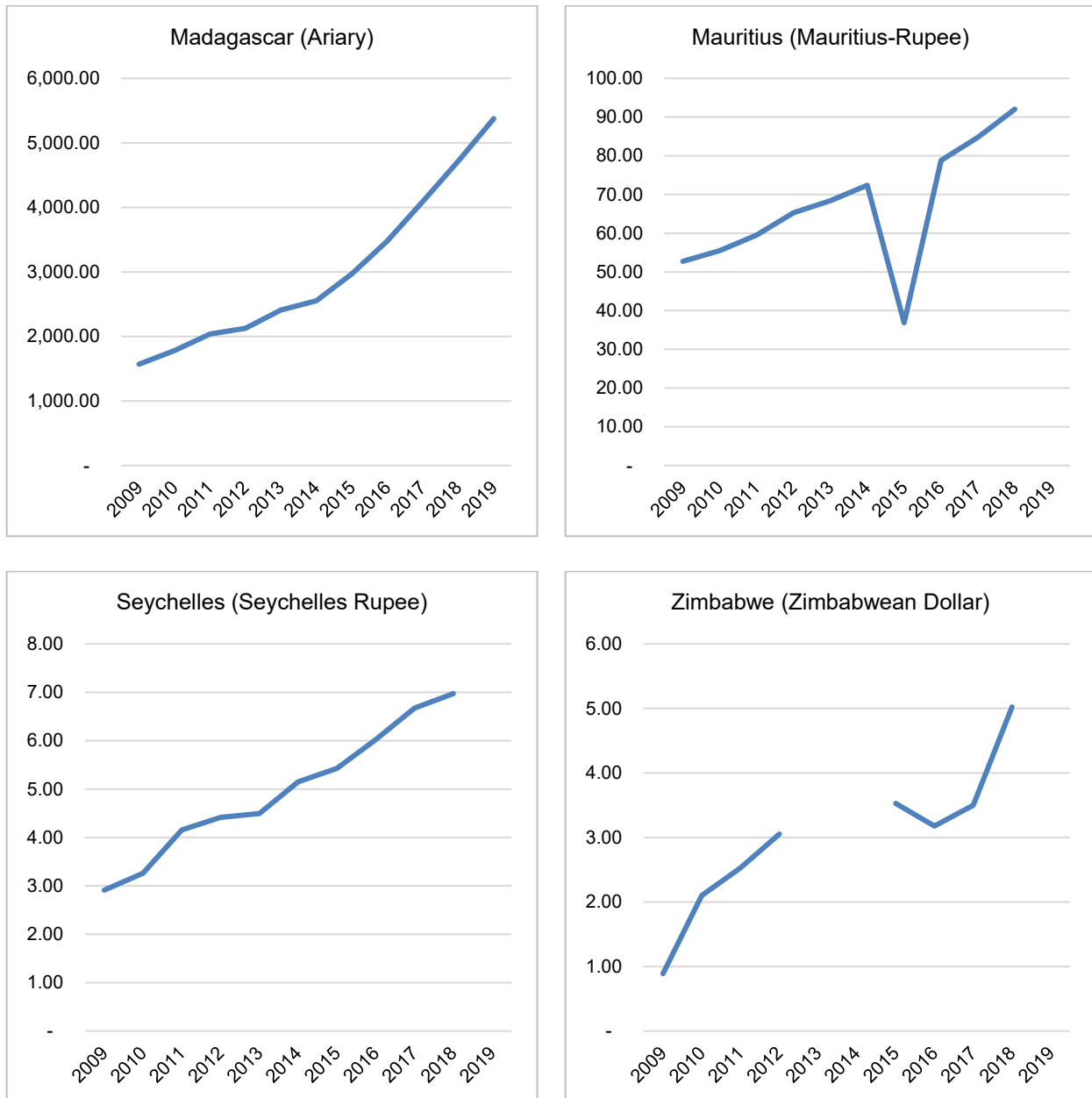
Top 20 imports Zimbabwe from COMESA in 2019					Top 20 imports Zimbabwe from COMESA in 2017				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
6	3104	Mineral or chemical fertilisers, po	11.9	4.2%	6	1005	Maize (corn).	15.0	4.9%
7	1208	Flours and meals of oil seeds or ol	10.0	3.5%	7	2304	Oil-cake and other solid residues,	13.9	4.6%
8	3808	Insecticides, rodenticides, fungici	9.3	3.3%	8	1006	Rice.	11.1	3.6%
9	1005	Maize (corn).	8.9	3.1%	9	2401	Unmanufactured tobacco; tobacco ref	10.7	3.5%
10	2710	Petroleum oils and oils obtained fr	8.7	3.1%	10	1507	Soya-bean oil and its fractions, wh	9.8	3.2%
11	1006	Rice.	6.8	2.4%	11	3402	Organic surface-active agents (othe	9.3	3.1%
12	1507	Soya-bean oil and its fractions, wh	5.9	2.1%	12	1208	Flours and meals of oil seeds or ol	8.5	2.8%
13	2202	Waters, including mineral waters an	5.6	2.0%	13	3004	Medicaments (excluding goods of hea	6.5	2.1%
14	2837	Cyanides, cyanide oxides and comple	5.2	1.8%	14	3401	Soap; organic surface-active produc	6.5	2.1%
15	1201	Soya beans, whether or not broken.	4.6	1.6%	15	1202	Ground-nuts, not roasted or otherwi	6.0	2.0%
16	2401	Unmanufactured tobacco; tobacco ref	4.2	1.5%	16	8429	Self-propelled bulldozers, angledoz	5.8	1.9%
17	3004	Medicaments (excluding goods of hea	4.1	1.5%	17	1902	Pasta, whether or not cooked or stu	5.7	1.9%
18	8701	Tractors (other than tractors of he	4.1	1.4%	18	3104	Mineral or chemical fertilisers, po	5.1	1.7%
19	3824	Prepared binders for foundry moulds	4.0	1.4%	19	713	Dried leguminous vegetables, shelle	3.7	1.2%
20	2309	Preparations of a kind used in anim	3.9	1.4%	20	8704	Motor vehicles for the transport of	3.7	1.2%
		Total goods exports	282.4	100.0%			Total goods exports	305.5	100.0%

Top 20 imports Zimbabwe from COMESA in 2019					Top 20 imports Zimbabwe from COMESA in 2017				
	Product code	Description	Trade value in million USD	Share in total exports		Product code	Description	Trade value in million USD	Share in total exports
		Total of top 5 exports	93.5	33%			Total of top 5 exports	104.6	34%
		HHI top 5	0.3				HHI top 5	0.2	
		Total of top 10 exports	142.4	50.4%			Total of top 10 exports	165.0	54.0%
		HHI top 10	0.13				HHI top 10	0.11	
		Total of top 20 exports	190.7	67.5%			Total of top 20 exports	225.9	73.9%
		HHI top 20	0.08				HHI top 20	0.07	

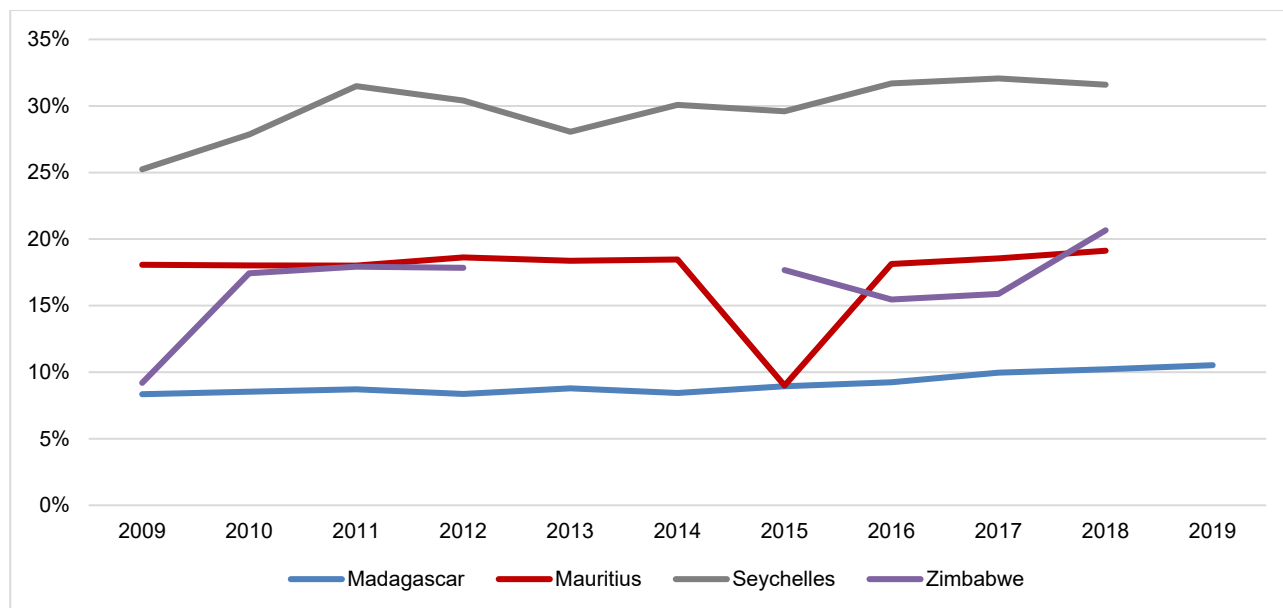
Source: UN Comtrade data

Annex IX (Chapter 5): Budgetary impacts

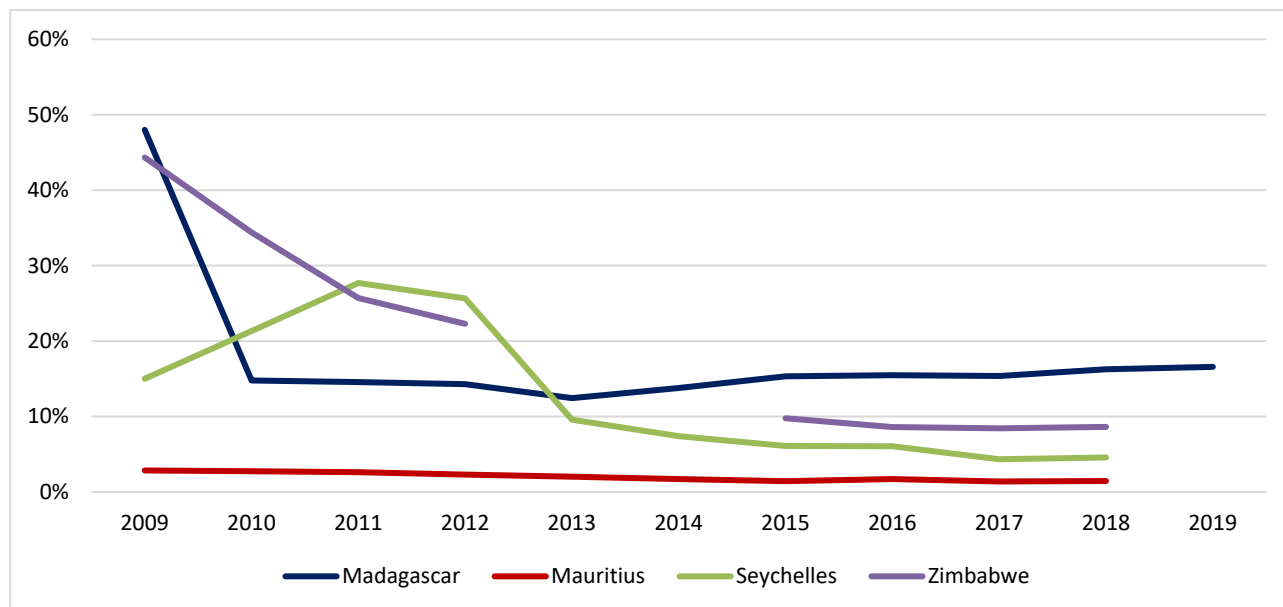
Figure 22: Overall tax revenue, in current local currency



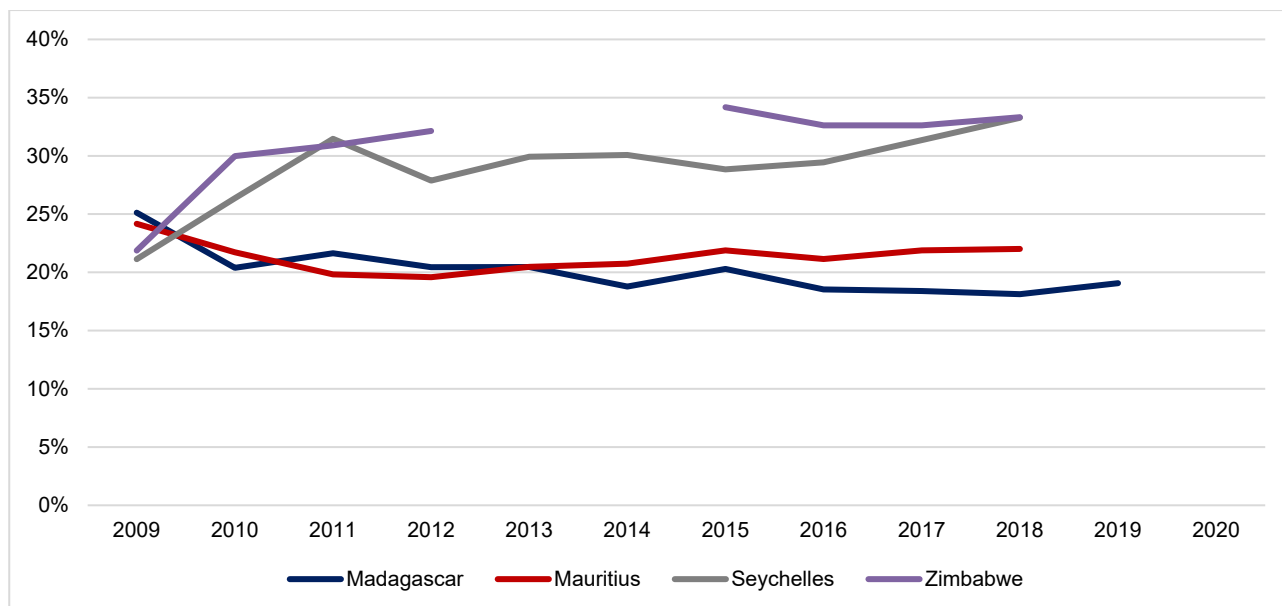
Source: World Bank.

Figure 23: Annual tax revenue, % of annual GDP

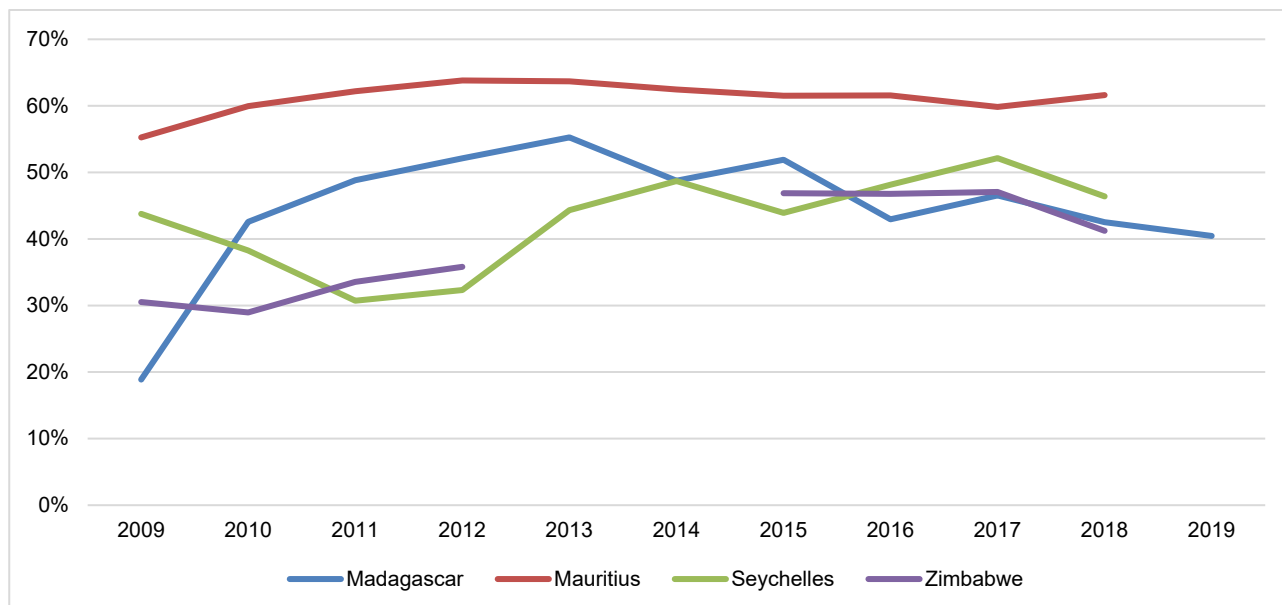
Source: World Bank.

Figure 24: Annual revenues from customs and other import duties, % of annual tax revenue

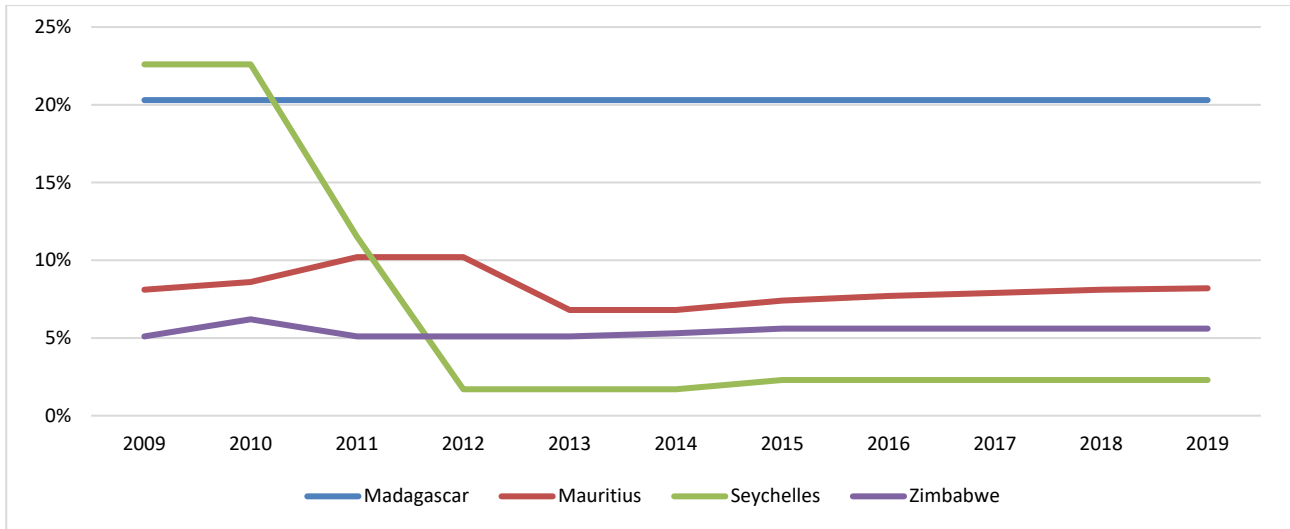
Source: World Bank.

Figure 25: Annual revenues from taxes on income, profits and capital gains, % of annual tax revenue

Source: World Bank.

Figure 26: Annual revenues from taxes on goods and services, % of annual tax revenue

Source: World Bank.

Figure 27: Annual labour taxes and contributions, in % of commercial profits

Source: World Bank.

Annex X (Chapter 6): Background information and analysis for the evaluation of the interim EPA's social, gender, human rights and environmental impacts in the five ESA countries

After the initial overview of findings, this Annex provides background information for the evaluation of the interim EPA with ESA countries. Section 1 presents the initial screening of the interim EPA's provisions for the evaluation. This screening highlights the importance of the indirect impacts arising from trade and economic provisions in the interim EPA, such as the reduction in trade barriers. Section 2 provides detailed information for the evaluation of social, gender and human rights impacts. Section 3 provides detailed information for the evaluation of environmental impacts. (Sections 2 and 3 in turn draw on more detailed country assessments that will be submitted with the SIA report on the TSD Chapter.)

Table 93: Overview of social, gender, human rights and environmental issues in key ESA economic sectors

Sector	Social, gender and human rights issues and trends	Environmental issues and trends	Evidence of EPA impacts
Agriculture			
Vanilla cultivation in Madagascar	<ul style="list-style-type: none"> Prices have increased but influence on wages not clear Child labour reported 	<ul style="list-style-type: none"> Vanilla cultivation can indirectly increase deforestation pressures (similar impacts are seen for other permanent crops, including cloves and coffee) 	<ul style="list-style-type: none"> EU a major importer (vanilla is one of Madagascar's top exports) EU companies accused of neglecting child labour issues, though some have joined sustainability initiatives Direct causal links between interim EPA and environmental, social, human rights impacts not identified; overall, while export values have increased, export volumes have remained largely stable
Sugar cultivation and processing in Mauritius	<ul style="list-style-type: none"> Fall in employment following change in EU/ACP sugar regime While policy actions provided some support, many workers saw incomes decline. Women have been more adversely affected CGE modelling suggests that negative impacts would have been greater without the interim EPA 	<ul style="list-style-type: none"> Water abstraction for irrigation Use of agricultural chemicals Mauritius has promoted biomass energy from sugar crop waste 	<ul style="list-style-type: none"> Main change in EU sugar import regime occurred outside the interim EPA CGE modelling suggests that exports were greater with the interim EPA than a scenario without it EU development cooperation has supported restructuring, renewable energy and other projects
Tobacco cultivation and processing in Zimbabwe	<ul style="list-style-type: none"> Reports of child labour Wages have declined compared to poverty line Evidence that workers on farms and factories are exposed to health and 	<ul style="list-style-type: none"> Water abstraction for irrigation Use of agricultural chemicals When expanding, tobacco farms created 	<ul style="list-style-type: none"> Tobacco exports to the EU continue but have declined since 2010, but CGE modelling suggests it was greater with the interim

Sector	Social, gender and human rights issues and trends	Environmental issues and trends	Evidence of EPA impacts
	safety risks, including exposure to nicotine and pesticides	pressures on biodiversity and forests	EPA than a scenario without it <ul style="list-style-type: none"> No evidence that labour or environmental issues are linked to the interim EPA; nor that they have improved with it
Sugar cultivation and processing in Zimbabwe	<ul style="list-style-type: none"> Reports of child labour 	<ul style="list-style-type: none"> Water abstraction for irrigation Use of agricultural chemicals 	<ul style="list-style-type: none"> Sugar exports to the EU declined (2015 to 2019), but CGE modelling suggests exports were greater with the interim EPA Sugar produced with child labour may have continued to be exported to the EU
Fisheries			
Shrimp and prawn aquaculture in Madagascar	<ul style="list-style-type: none"> Concerns over impacts on local, small-scale fishing 	<ul style="list-style-type: none"> Pressures on coastal ecosystems 	<ul style="list-style-type: none"> Fish, including crustaceans, are a major export to the EU; clear link to the interim EPA not identified
Tuna fishing and processing (Comoros, Madagascar, Mauritius, Seychelles)	<ul style="list-style-type: none"> Concerns over impacts on local, small-scale fishing, including overfishing (e.g., Madagascar) 	<ul style="list-style-type: none"> Concerns over pressures on fish stocks 	<ul style="list-style-type: none"> Fish have been a major export to the EU Interim EPA sets out requirements for VMS and IUU; actions linked to SFPAs (see the case study on fisheries)
Manufacturing			
Textile production (Madagascar)	<ul style="list-style-type: none"> Reports of instance of piece-rate payments, forced and underpaid overtime and poor safety conditions These issues affect women, who represent a high share in workforce 	<ul style="list-style-type: none"> Water consumption and discharge of chemicals 	<ul style="list-style-type: none"> Textiles are Madagascar's leading export to the EU and have grown under the interim EPA; moreover, CGE modelling suggests that exports were greater with the interim EPA
Textile production (Mauritius)	<ul style="list-style-type: none"> Production and employment have fallen An increasing share of migrant workers from Asia as wages are low 	<ul style="list-style-type: none"> Water consumption and discharge of chemicals 	<ul style="list-style-type: none"> Textiles are a leading export to the EU but have declined under the interim EPA, though CGE modelling suggests exports would have been lower still without it
Mining			
Diamond mining in Zimbabwe	<ul style="list-style-type: none"> Sector includes formal companies and small-scale, often illegal, miners Allegations of human rights violations 	<ul style="list-style-type: none"> Hazardous materials and waste Waste water Land degradation, loss of agricultural land and deforestation 	<ul style="list-style-type: none"> A direct link to the interim EPA has not been identified, but diamonds appear Zimbabwe's largest export to the EU

Sector	Social, gender and human rights issues and trends	Environmental issues and trends	Evidence of EPA impacts
	<ul style="list-style-type: none"> Miners often live and work in poor conditions Lack of consultation with local communities 		<ul style="list-style-type: none"> Both EU and Zimbabwe subscribe to the Kimberly process, but diamonds exported to the EU may be linked to human rights and environmental impacts
Mica mining (Madagascar)	<ul style="list-style-type: none"> Reports of extensive child labour in mica and gemstone mining in unsafe conditions Many mines reported to be illegal and unregulated 	<ul style="list-style-type: none"> Hazardous materials and waste Waste water Land degradation, loss of agricultural land and deforestation 	<ul style="list-style-type: none"> EU imports a small share of Madagascar's mica exports

Source: Own compilation

Initial screening of the interim EPA's provisions

A preliminary screening of the social, human rights and environmental measures in the interim EPA is presented in the following three tables. This screening scored the measures on a three-point scale, from + for minor impacts to ++ for major impacts. The results show that most of the measures directly addressing social issues, human rights and the environment are expected to have had minor impacts.

Table 94: Initial screening of social measures in the interim EPA and their possible impacts

Interim EPA measure	Possible social impacts	Potential importance
Reaffirmation of coherence between the EPA and the Cotonou Agreement (Recital 7, Art.2, Art.4, Art. 36, Art.53)	Improved coherence of the actions taken further to the interim EPA with the objectives and the principles of other international instruments and, in particular with the Cotonou agreement as the overarching framework for EU relations with African, Caribbean and Pacific (ACP) countries, in the field of human rights, democratic principles and the rule of law (Article 9 of the Cotonou agreement), social rights (Articles 9 and 50) and environment (Article 49). ¹⁰⁴ While these articles do not foresee any specific measures to improve social rights, it should ensure at least that other measures do not have adverse effects on social rights.	+
Reaffirmation of coherence with the Millennium Development Goals (Art.2)	The interim EPA reinforces the implementation of measures that promote the achievement of the MDGs; particularly relevant MDGs in the field of social sustainability are MDG 1 (eradicate poverty and hunger) and MDG 3 (promote gender equality). Again, specific measures directly targeted at these goals are only under the chapter on development cooperation; these articles merely reinforce their importance and should ensure avoidance of adverse effects and deterioration of the situation.	+
Promotion of good governance (Art. 2 (b))	Improved commitment of national authorities to respect the principles of good governance in the ESA region – possible impact on good governance.	+

Source: Own analysis from EPA provisions

¹⁰⁴ M. Lerch, *Environmental and social standards in the Economic Partnership Agreement (EPA) with West Africa: comparison to other EPAs*, European Parliament publication, 2015, available at: [https://www.europarl.europa.eu/RegData/etudes/IDAN/2015/549040/EXPO_IDA\(2015\)549040_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/IDAN/2015/549040/EXPO_IDA(2015)549040_EN.pdf);
L. Bartels, *Human rights provisions in Economic Partnership Agreements in light of the expiry of the Cotonou Agreement in 2020*, European Parliament publication, 2017, available at [https://www.europarl.europa.eu/RegData/etudes/STUD/2017/578011/EXPO_STU\(2017\)578011_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2017/578011/EXPO_STU(2017)578011_EN.pdf)

Table 95: Initial screening of human rights measures of the interim EPA and their possible impacts

Interim EPA measure	Possible human rights impacts	Potential Importance
Reaffirmation of coherence between the EPA and the Cotonou Agreement (Recital 7, Art. 2, Art. 4)	Improved coherence of the actions taken further to the interim EPA with the objectives and the principles of other international instruments and, in particular with the Cotonou agreement as the overarching framework for EU relations with African, Caribbean and Pacific (ACP) countries, in the field of human rights, democratic principles and the rule of law (article 9 of the Cotonou agreement) ¹⁰⁵ . This provision provides a general framework for rights but not specific actions.	+
Application of non-exclusion clause under the Cotonou agreement (Art. 65)	Improved respect of human rights democratic principles, or the rule of law in the ESA countries in order to avoid the application of the non-execution clause under articles 11(b), 96 and 97 of the Cotonou Agreement (as referred to under article 65 of the interim EPA) and the suspension of the EPA trade preference for a country sanctioned under the Cotonou provisions for breaching human rights, democratic principles, or the rule of law. ¹⁰⁶ This provision links the EPA to the Cotonou Agreement; however, its application would depend on actions taken outside the EPA itself.	+
Gender-mainstreaming in development co-operation (Art. 38(2)(h))	Increased mainstreaming of a gender perspective in the development co-operation programmes (e.g. budget, activities, etc) implemented in the ESA countries – possible impact on gender equality to be assessed through consultation with funding and implementing entities and, in particular with DG DEVCO. Increased financing of development projects aimed at tackling gender-related issues – this provision can have an indirect impact on gender equality (see also the table below that addresses development cooperation).	+
Involvement of indigenous development organisations in investment (Art. 40)	Increased presence and enhanced capacity of indigenous development organisations to engage in sustainable and equitable economic development of ESA through investment – possible impact on rights of indigenous people to be assessed through consultation with indigenous development organisations.	+
Human resource development and skills training (Annex IV)	Increased access to inclusive (for all), equitable (equal treatment and opportunities for students) and quality education – possible impact on right to education.	+
Trade-related Adjustment costs (Annex IV)	Mitigation against fiscal revenue losses and economic costs of adjustment to protect basic service sectors e.g. health and education – possible impact on right to education and health.	+

Source: Own analysis from EPA provisions

¹⁰⁵ M. Lerch, *Environmental and social standards in the Economic Partnership Agreement (EPA) with West Africa: comparison to other EPAs*, European Parliament publication, 2015, available at [https://www.europarl.europa.eu/RegData/etudes/IDAN/2015/549040/EXPO_IDA\(2015\)549040_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/IDAN/2015/549040/EXPO_IDA(2015)549040_EN.pdf); L. Bartels, *Human rights provisions in Economic Partnership Agreements in light of the expiry of the Cotonou Agreement in 2020*, European Parliament publication, 2017, available at [https://www.europarl.europa.eu/RegData/etudes/STUD/2017/578011/EXPO_STU\(2017\)578011_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2017/578011/EXPO_STU(2017)578011_EN.pdf)

¹⁰⁶ [https://www.europarl.europa.eu/RegData/etudes/BRIE/2018/620218/EPRS_BRI\(2018\)620218_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2018/620218/EPRS_BRI(2018)620218_EN.pdf)

Table 96: Initial screening of environmental measures in the interim EPA and their possible impacts

Interim EPA measure	Possible environmental impacts	Potential importance
Support for the implementation of international environmental agreements, conventions and treaties (Art. 49)	Improvements in environmental conditions and governance due to improvements in implementation of multilateral environmental agreements (MEAs)	++
Cooperation on water resources (Art. 50)	Improved water infrastructure, technology transfer, development of legal frameworks including integrated water management, via cooperation activities, leading to pollution reduction and improved water resources management.	+
Cooperation on biodiversity (under Art. 51)	Improved biodiversity management, including forests, wildlife, biological resources and marine resources, via actions and cooperation, including for the development of legal frameworks (among which the stronger implementation of MEAs)	+
Promotion of ESA industries related to environment (under Art. 51)	Development of ESA environmental industries and environmentally friendly products, via actions including promotion of EU-ESA partnerships, linkages, joint ventures and exchange of information (among which the stronger implementation of MEAs)	+
Cooperation on environmental degradation (under Art. 51)	Improved air and water quality and waste management, possibly also actions against soil erosion and desertification, via cooperation, including for the development of legal frameworks (among which the stronger implementation of MEAs)	+
Cooperation on natural resources, including water and biodiversity (Art. 38)	Improvements in environmental conditions due to increased EU development cooperation	+

Source: Own analysis from EPA provisions

A preliminary screening of trade and economic measures was also carried out: it indicates that measures in these areas are expected to have greater, though indirect impacts, in terms of social issues, gender, human rights and environment, than the measures directly addressing these aspects of sustainability.

Table 97: Initial screening of selected trade, investment and development cooperation provisions of the interim EPA and their possible social, human rights and environmental impacts

Chapter and measures	Possible social, human rights and environmental impacts	Potential importance
Trade in goods: reducing tariffs and non-tariff measures (Chapter I, Titles I, II and III)	The provisions may have increased trade in goods, potentially leading to:	
	Social: new employment opportunities from exports but risks for existing employment from EU imports regarding labour demand, wages, working conditions; increase in public revenues from VAT – increase in social protection expenditure; depending on the type of labour demand created, increased productivity may have led to an increase or decrease in unskilled work, low wages, labour migration and related exploitation/trafficking	++
	Human rights: reduction in the price and increased availability (in terms of quantity, choice, and price) of food and pharmaceutical products/medical devices – women may be affected in a different manner (affecting right to adequate living conditions and gender equality)	++
	Environment: scale and structure effects	

Chapter and measures	Possible social, human rights and environmental impacts	Potential importance
		++
Trade defence measures (Chapter I, Title IV)	<p>The provisions may have protected domestic sectors from dumping, possibly leading to:</p> <p>Social: protection of employment (jobs, wages), but higher prices for certain goods for consumers</p> <p>Human rights: major effects not identified</p> <p>Environment: major effects not identified</p>	<p>+</p> <p>..</p> <p>..</p>
<p>Development cooperation (Chapter IV and Annex IV) on:</p> <ul style="list-style-type: none"> • Trade-related adjustment costs • Gender mainstreaming • Public Private Partnership mechanisms, entrepreneurship • Local communities¹⁰⁷ • HR development and skills training • Mainstreaming environment • Agriculture • Fisheries 	<p>The provisions may have increased EU development cooperation in the ESA countries across a broad range of areas, leading to:</p> <p>Social: Positive impact on employment (SDG 8), and, consequently on poverty (SDG 1), if wage standards are respected; cooperation in 'risk' sectors, such as mining, could be conducive to various SDGs, namely the 'promotion of health and safety standards' (SDG 8), the protection of small-scale miners and community rights (indirect impacts related to various SDGs, e.g. SDG 1, 2 and 8); 'developing policy and mechanisms to manage vulnerability of mineral export dependency countries' (Annex IV, key area c (vi)) could be conducive to SDG 10; increased gender equality; impacts that are in line with SDG 4 on inclusive and equitable quality education - as a consequence, impact on employability and income (SDGs 1 and 8)</p> <p>Human rights: EU development cooperation expected to support human rights across projects; for example, via mainstreaming of a gender perspective in the development co-operation programmes and development projects directly addressing gender-related issues – possible impact on gender equality.</p> <p>Environment: better environmental management in agriculture and manufacturing, better fisheries management (see also separate environment and fisheries tables)</p>	<p>++</p> <p>+</p> <p>++</p>
<p>Private sector development (Chapter IV, Title II), for:</p> <ul style="list-style-type: none"> • Support for investment • Industrial development and competitiveness • Micro, small and medium-sized enterprises • Mining and minerals • Tourism development 	<p>The provisions may have increased EU FDI in ESA5 countries, possibly leading to:</p> <p>Social: potential increase in employment in sectors receiving EU investment; potential spill-over effects (skills improvement, job creation); better working conditions, in particular in the mining sector if labour standards are respected; potential increase in wage gaps (foreign-owned vs. local firms); potential impact on gender equality; tourism may have created important and well-paid jobs, but may have also increased consumer prices</p> <p>Human rights: higher living conditions potentially linked to better working conditions/better salary, higher levels of social welfare (e.g. health, education, housing) potentially linked to higher public revenues from taxation– women may be affected in a different manner (affecting the right to adequate living conditions, gender equality, and potentially, rights of indigenous people);</p>	<p>+</p> <p>+</p>

¹⁰⁷ Several points in Annex V envisage participation and empowerment of local communities, especially in the context of the development of the tourism and mining sectors.

Chapter and measures	Possible social, human rights and environmental impacts	Potential importance
	Environment: scale, structure, technology and management effects. These may be particularly important for mining and minerals and tourism development. Implementation mechanisms for these provisions are not clearly set out, however.	+
Infrastructure development (Chapter IV, Title III): transport, energy, ICT	The provisions may have increased EU support for infrastructure in ESA5 countries, possibly leading to:	
	Social: improvement of infrastructure (e.g. transport) is likely to have a positive effect on productivity and possibly job creation; potential improvement of access to education/lifelong learning through expansion of ICT	+
	Human rights: higher levels of protection of right to adequate living conditions thanks to better services for citizens	+
	Environment: scale, structure, technology and management effects (e.g. improvement in roads, ports and airports leading to greater traffic, growth of renewable energy, waste water treatment) The provisions, however, are vague and may not have a strong impact.	+

Source: Own analysis and compilation from EPA provisions

Based on this screening, two areas were identified as priorities for the evaluation: reduction of trade barriers and the resulting changes in trade; and EU development cooperation.

Context and overview for the assessment of social, gender and human rights impacts

Overview

ESA5 countries are highly diverse in terms of geographical size, the size of the total population and economic characteristics. Aggregate GDP and GDP per capita generally improved in all ESA5 countries since 2010. At the same time, the state of economic development, as measured by GDP per capita, still differs significantly between individual ESA5 countries. With a GDP per capita of 16,434 USD in 2018, Seychelles is a high-income country. Mauritius is an upper-middle-income country, with a GDP of 11,239 USD in 2019. Comoros and Zimbabwe are lower-middle-income countries, Madagascar still is a low-income country. Due to its political crisis, Zimbabwe's total economic output is estimated to have declined considerably in 2019.

Such heterogeneity is reflected in the social gender and human rights conditions of the countries, which present wide differences in terms of employment (overall employment, female, youth and child labour, employment by sectors of economic activity), poverty and inequality rates and access to resources, gender issues. Such wide differences are represented in the Human Development Index (HDI), which ranges from 0.521 for Madagascar to 0.801 for Seychelles (2018 data). The table below provides a comparative view of the ESA5 countries using a set of common sources and indicators for the key social, gender and human rights issues, on which the interim EPA could have an impact. Data are provided for the most recent year available. A more detailed view of the evolution of these key indicators is each country is provided in each country profile.

Table 98: Overview of the key social, gender and human rights indicators in the ESA5 countries in the 2010-2019 period

Indicators		Comoros	Madagascar	Mauritius	Seychelles	Zimbabwe
Employment (total population) 15+ ¹⁰⁸	Value	41.4	84.6	54.4	64.6	79
	Last available year	2019	2019	2019	2019	2019
Employment (female population) 15+ ¹⁰⁹	Value	34.9	81.8	40.6	61.6	73.8
	Last available year	2019	2019	2019	2019	2019
Child labour (children ages 5-17)	Value	28.5% ¹¹⁰	22.11% ¹¹¹			27.9% ¹¹²
	Last available year	2010-17	2016			2019
Employment in Agriculture (% of employed population) ¹¹³	Value	50.38	64.22	6.07	3.30	66.54
	Last available year	2019	2019	2019	2019	2019
Employment in Industry (% of employed population) ¹¹⁴	Value	13.03	8.99	4.99	12.80	6.58
	Last available year	2019	2019	2019	2019	2019
Employment in Services (% of employed population) ¹¹⁵	Value	36.59	26.79	25.29	82.80	26.87
	Last available year	2019	2019	2019	2019	2019
Female employment in Agriculture (% of female employed population) ¹¹⁶	Value	55.70	60.42	15.77	0.70	69.95
	Last available year	2019	2019	2019	2019	2019
Female employment in Industry (% of female employed population) ¹¹⁷	Value	9.80	8.58	68.64	6.10	1.92
	Last available year	2019	2019	2019	2019	2019

¹⁰⁸ ILO Data: https://www.ilo.org/shinyapps/bulkexplorer54/?lang=en&segment=indicator&id=EMP_2WAP_SEX_AGE_RT_A¹⁰⁹ ILO Data: https://www.ilo.org/shinyapps/bulkexplorer54/?lang=en&segment=indicator&id=EMP_2WAP_SEX_AGE_RT_A¹¹⁰ UNDP Data: <http://www.hdr.undp.org/en/indicators/181306>¹¹¹ US Department of State, 2019 Country Reports on Human Rights Practices: Madagascar, available at <https://www.dol.gov/agencies/ilab/resources/reports/child-labor/madagascar>¹¹² UNICEF, UNICEF Data Warehouse, Zimbabwe, available at:https://data.unicef.org/resources/data_explorer/unicef/?ag=UNICEF&df=GLOBAL_DATAFLOW&ver=1.0&dq=ZWE.PT_CHLD_5-17_LBR_ECON-HC.&startPeriod=1970&endPeriod=2020¹¹³ ILO Data: https://www.ilo.org/shinyapps/bulkexplorer40/?lang=en&segment=indicator&id=EMP_TEMP_SEX_ECO_NB_A¹¹⁴ ILO Data: https://www.ilo.org/shinyapps/bulkexplorer40/?lang=en&segment=indicator&id=EMP_TEMP_SEX_ECO_NB_A¹¹⁵ ILO Data: https://www.ilo.org/shinyapps/bulkexplorer40/?lang=en&segment=indicator&id=EMP_TEMP_SEX_ECO_NB_A¹¹⁶ ILO Data: https://www.ilo.org/shinyapps/bulkexplorer40/?lang=en&segment=indicator&id=EMP_TEMP_SEX_ECO_NB_A¹¹⁷ ILO Data: https://www.ilo.org/shinyapps/bulkexplorer40/?lang=en&segment=indicator&id=EMP_TEMP_SEX_ECO_NB_A

Indicators		Comoros	Madagascar	Mauritius	Seychelles	Zimbabwe
Female employment in Services (% of female employed population) ¹¹⁸	Value	34.50	31.00	79.24	92.40	28.13
	Last available year	2019	2019	2019	2019	2019
Unemployment rate (total population) ¹¹⁹	Value	8.1	83.9	6.3	3	16.9
	Last available year	2014	2015	2019	2019	2019
Unemployment (female population) ¹²⁰	Value	10.4	88.6	9.7	2.7	17.9
	Last available year	2014	2015	2019	2019	2019
Unemployment youth (15-24) ¹²¹	Value	19.5	3.4	21.8	9.7	27.5
	Last available year	2014	2015	2019	2019	2019
Share of population below the international poverty line ¹²²	Value	18.1	77.6	0.1		34
	Last available year	2013	2012	2019		2019
Human Development Index ¹²³	Value	0.538	0.521	0.796	0.801	0.563
	Last available year	2018	2018	2018	2018	2018

Source: ILO data, UNDP data and World Bank

¹¹⁸ ILO Data: https://www.ilo.org/shinyapps/bulkexplorer40/?lang=en&segment=indicator&id=EMP_TEMP_SEX_ECO_NB_A

¹¹⁹ ILO Data: https://www.ilo.org/shinyapps/bulkexplorer1/?lang=en&segment=indicator&id=IFL_4IEM_SEX_ECO_IFL_NB_A

¹²⁰ ILO Data: https://www.ilo.org/shinyapps/bulkexplorer1/?lang=en&segment=indicator&id=IFL_4IEM_SEX_ECO_IFL_NB_A

¹²¹ World Bank data from <https://sdg-tracker.org/no-poverty#targets>

¹²² World Bank data from <https://sdg-tracker.org/no-poverty#targets>

¹²³ UNDP data: <http://hdr.undp.org/en/data>

Employment rates vary from 41.4% in Comoros to 84.6% in Madagascar in 2019 and have shown a limited change in the 2010-2019 period across the ESA5 countries. Similarly, female employment varies across the countries, while everywhere lower than male employment. More than 20% of children aged 5 to 17 years old work in Comoros (28.5% in the 2010-2017 period), Madagascar (22.11% in 2016) and Zimbabwe (27.9% in 2019).

While registering a decline in all ESA5 countries in the 2010-2019 period, except Seychelles, agriculture is the sector with the higher share of the workforce for Comoros, Madagascar, Mauritius and Zimbabwe. Female employment rates in the agriculture sector remain lower than the corresponding male employment rates in all countries. Services represent the largest employment sector in Seychelles (82.8% in 2019), which employs more than 90% of the female workforce in the country.

Unemployment across the ESA5 countries also varies, registering the higher rates in Comoros and Zimbabwe (8.1% in 2014 and 16.9% in 2019, respectively). Zimbabwe in particular registered an increase in recent years, most likely as a consequence of the country's political and economic crises of the recent past. A large variation is registered also on working poverty, from virtually 0% in Mauritius to 67.7% in Madagascar, but in presence of a generalised descending trend across the 2010-2019 period. All ESA5 countries register very high levels of informal employment (ranging from 93.4% in 2014 in Comoros to 14.1% in 2019 in Seychelles), both for the male and female workforce, but overall higher among women.

The situation of all the ESA5 countries as measured by the Human Development Index has somewhat improved in the 2010-2019 period, albeit from very different starting points. Mauritius and Seychelles are ranked 66 and 62 out of 189 countries respectively, making them high and very high human development countries. The other ESA5 countries are at the other hand of the spectrum, as Comoros is ranked 156 out of 189 countries, Madagascar 162 and Zimbabwe 150 out of 189 countries.¹²⁴

A similar diverse situation also concerns the prevalence of poverty and inequality, with Mauritius and Seychelles registering low shares of the population living below the international poverty line (lower than 1% in both countries), while Comoros, Madagascar and Zimbabwe have much higher proportions (up to 37.3% in Madagascar).

Ratification of international conventions on social, gender and human rights policy

The table below provides an overview of the ratification of key international labour rights conventions and human rights conventions.

¹²⁴ UNDP, *Human Development Report 2019*, available at <http://report.hdr.undp.org/>.

Table 99: Main multi-lateral agreements and international conventions on social, gender and human rights policy in ESA5 countries

	Comoros	Madagascar	Mauritius	Seychelles	Zimbabwe
Labour Rights Conventions	ILO member since 23/10/1978	ILO member since 01/11/1960	ILO member since 05/05/1969	ILO member since 25/04/1977	ILO member since 06/06/1980
Fundamental Conventions					
Convention concerning Freedom of Association and Protection of the Right to Organise, No 87 (1948)	23/10/1978	01/11/1960	01/04/2005	06/02/1978	09/04/2003
Convention concerning the Application of the Principles of the Right to Organise and to Bargain Collectively, No 98 (1949)	23/10/1978	03/06/1998	02/12/1969	04/10/1999	27/08/1998
Convention concerning Forced or Compulsory Labour, No 29 (1930)	23/10/1978	01/11/1960	02/12/1969	06/02/1978	27/08/1998
Protocol to the Forced Labour Convention, No 29 (2014)	/	11/06/2019	/	/	22/05/2019
Convention concerning the Abolition of Forced Labour, No 105 (1957)	23/10/1978	06/06/2007	02/12/1969	06/02/1978	27/08/1998
Convention concerning Minimum Age for Admission to Employment, No 138 (1973)	14/03/2004	31/05/2000	30/07/1990	07/03/2000	06/06/2000
Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, No 182 (1999)	14/03/2004	04/10/2001	08/06/2000	28/09/1999	11/12/2000
Convention concerning Equal Remuneration of Men and Women Workers for Work of Equal Value, No 100 (1951)	23/10/1978	10/08/1962	18/12/2002	23/11/1999	14/12/1989
Convention concerning Discrimination in Respect of Employment and Occupation, No 111 (1958)	14/03/2004	11/08/1961	18/12/2002	23/11/1999	23/06/1999
Governance Conventions					
Convention concerning Labour Inspection Convention, No 81 (1947)	23/10/1978	21/12/1971	02/12/1969	28/10/2005	16/09/1993
Protocol of 1995 to Convention No 81	/	/	/	/	/
Convention concerning Employment Policy Convention, No 122 (1964)	23/10/1978	21/11/1966	/	/	/
Convention concerning Labour Inspection (Agriculture), No 129 (1969)	/	21/12/1971	/	/	16/09/1993

	Comoros	Madagascar	Mauritius	Seychelles	Zimbabwe
Convention concerning Tripartite Consultation (International Labour Standards), No 144 (1976)	06/06/2014	22/04/1997	14/06/1994	28/10/2005	14/12/1989
UN Human Rights Conventions	UN Member since 12/11/1975	UN Member since 20/09/1960	UN Member since 24/04/1968	UN Member since 21/09/1976	UN Member since 25/08/1980
Convention on the Prevention and Punishment of the Crime of Genocide (1948)	27/09/2004	/	08/07/2019	05/05/1992	13/05/1991
International Convention on the Elimination of All Forms of Racial Discrimination (1965)	27/09/2004	07/02/1969	30/05/1972	07/03/1978	13/05/1991
International Covenant on Civil and Political Rights (1966)	Signed only (25/09/2008)	21/06/1971	12/12/1973	05/05/1992	13/05/1991
International Covenant on Economic Social and Cultural Rights (1966)	Signed only (25/09/2008)	22/09/1971	12/12/1973	05/05/1992	13/05/1991
Convention on the Elimination of All Forms of Discrimination Against Women (1979)	31/10/1994	17/03/1989	9/07/1984	05/05/1992	13/05/1991
Convention Against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (1984)	25/05/2017	13/12/2005	09/12/1992	05/05/1992	/
Convention on the Rights of the Child (1989)	22/06/1993	19/03/1991	26/07/1990	07/09/1990	08/03/1990
ICRMW International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (1990)	Signed only (22/09/2000)	13/05/2015	/	15/12/1994	/
Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (2002)	/	21/09/2017	21/06/2005	/	/
Convention on the Rights of Persons with Disabilities (2006)	16/06/2016	12/06/2015	08/01/2010	02/10/2009	23/09/2013
International Convention for the Protection of All Persons from Enforced Disappearance (2006)	Signed only (06/02/2007)	Signed only (06/02/2007)	/	18/01/2017	/

Source: United Nations, ratification database: <https://treaties.un.org/Pages/ParticipationStatus.aspx?clang=en>; International Labour Organisation, 2020, Normlex database: <https://www.ilo.org/dyn/normlex/en/f?p=1000:12001::NO>

Note: / neither ratified nor signed

Identifying social, gender and human rights impacts of the interim EPA

Introduction and overview

For the ex-post evaluation, the analysis of the social gender and human rights impacts of the interim EPA between the EU and the ESA5 countries considers the following interrelated elements:

- **Social impacts** (disaggregated by gender, when possible) on level of employment, wages, inequality, winners and losers, poverty reduction, labour rights, labour standards, working conditions, with special attention to child labour;
- **Gender impacts** on women's economic empowerment, employment and welfare, gender equality;
- **Human rights impact** the right to an adequate standard of living, in particular the right to food.

The analysis focuses on the impacts of the interim EPA since the start of its provisional application with each partner country in 2012. The analysis considers the period from 2010 to 2019, using the years 2010 and 2011 as a baseline. The analysis only occasionally considers Comoros, as this country fully joined the interim EPA in 2019. Given the short timeframe between the entry into force of the interim EPA and the conduct of this evaluation, there was little information available to assess the social, gender and human rights impacts of the agreement on Comoros. Moreover, the ex-post evaluation does not take into account the impacts of the COVID-19 pandemic on the ESA countries.

Structure of the section

This section of the annex provides first an overview of the broad context and other elements to be considered for the analysis and then describes the general trends and issues relevant for the assessment of social, gender and human rights issues in the ESA countries. In particular, it describes the key results from the CGE and PE models carried out by DG trade, the general trends on employment encountered in the countries and some cross-sectors and cross-countries human rights issues. Afterwards, the section provides a more detailed analysis of the interim EPA impacts on specific industries and countries, which have been identified as the most relevant for the assignment. This analysis includes both the social impacts (in particular those on employment, salaries, working conditions, child labour and violation of working rights), gender issues (when relevant) and human rights issues (in particular on the right to food and the right to an adequate standard of living).

Changes in social, gender and human rights issues

Trade provisions are expected to bring positive impacts in terms of employment (as increased trade is expected to create more and new jobs) and working rights and conditions (as the economic partnership also requires adhering to the same international standards), which should also translate in the reduction of unemployment and informal employment, as well as in an increase in wages and improvement of living conditions. The interim EPA might also lead to adverse consequences. Trade in goods between the EU and the ESA countries might exacerbate labour rights, labour standards or working conditions issues already existing in some countries and/or sectors, such as agriculture or mining, that produce those goods. Furthermore, some of the interim EPA's provisions require the Parties, especially the EU, to cooperate and/or contribute to the realisation of certain objectives, such as poverty reduction, likely to have an indirect impact on human rights.

The following pages consider the evidence for these impacts.

The interim EPA is not the only policy initiative relevant to the analysis of trade and social impacts in the region. Africa is characterized by a substantial number of overlapping regional economic agreements (RECs.). The ESA countries are all members of two RECs in Africa, namely COMESA and the Southern African Development Community (SADC). They also have agreed to the Tripartite Agreement of 2015, a planned free

trade area with 27 potential members that would integrate SADC, COMESA and EAC regions, and they also signed the 2018 agreement for an AfCFTA that would have over 50 members¹²⁵. ESA countries also have trade agreements with other third countries, such as China and the US, which are important trade partners.

Other international developments affect trade dynamics for ESA countries and, thus, social, gender and human rights impacts. These include:

- the change in the EU/ACP countries sugar regime that impacted the sector before and independently from the interim EPA;
- the EU's Sustainable Fisheries Partnership Agreements (SFPAs), that affect fisheries in the four ESA island countries, including social aspects, as do international fisheries agreements;
- the evolution of international investment and production in global industries that have affected ESA countries: for example, the changes in the global textiles industry have interplayed with the provisions of the trade agreement and influenced the development of the sector in countries such as Mauritius and Madagascar.

In light of all the above, it needs to be underlined that most of the impacts identified by the analysis do not depend directly and exclusively on the trade agreement, but rather are the effect of a number of interplaying factors, one of which is the interim EPA. Whenever possible, the analysis tries to disentangle the impacts of the interim EPA, explaining to they interact with other elements of the policy and economic context. However, the availability of quantitative data and qualitative analysis is often not specific enough for the type of granular analysis required to provide such a level of detail.

General trends and issues

CGE Results

The results of the CGE modelling and PE model (for Seychelles) undertaken by DG Trade suggests that the overall impacts of the interim EPA have been limited, but overall positive for the ESA countries and the EU, in terms of outputs, exports and imports and of salaries.

While these results are important to assess the dimension of the trade agreement, they need to be put in the overall political, economic and social context of the EU and, especially, of the ESA countries. Therefore, the next sections of this annex will provide such elements to the analysis.

Furthermore, while a widely established practice in the evaluation of EU FTAs, CGE models bring some criticisms and issues that need to be taken into account when interpreting their results. Some of the critics concern the mechanics of the model, which tend to neglect the adjustment process and frictions related to the expansion of more competitive sectors as an effect of trade liberalisation, and the shift in employment related to it, as well as the financial implications that this adjustment entails in the presence of labour market frictions (re-training, temporary wage replacement payments, etc.). Furthermore, some critics concerned about the use of CGE models in the evaluation of the impact of trade reforms, especially in cases where initial levels of trade are low, for instance, if trade barriers are prohibitive. This problem may make trade models inappropriate especially for some developing countries and least developed countries which may have their bulk of trade concentrated in a few sectors only with a limited number of trading partners. It is argued that in these cases, CGE models underestimate the impact of trade liberalisation¹²⁶.

¹²⁵ Since then, Zimbabwe (May 2019) and Mauritius (October 2019) have ratified the AfCFTA.

¹²⁶ For a review of the main issues related with the use of CGE models in EU trade policy, see Nilsson, L. (2018). *Reflections on the Economic Modelling of Free Trade Agreements*. *Journal of Global Economic Analysis*, 3(1), 156-186.
doi:<http://dx.doi.org/10.21642/JGEA.030104AF>

All countries are estimated to have gained from the agreement, with Mauritius and Zimbabwe to have benefitted most. In detail, total exports from Madagascar to the EU are estimated to be 2% lower in absence of the EPA. By contrast, EU imports from Mauritius are estimated to be 93% lower and exports to Zimbabwe are estimated to be 18% lower in the case of no interim EPA. As for Seychelles, results from the PE model show that the interim EPA contributes to rising bilateral exports for both the EU and Seychelles. Total EU27 exports to Seychelles are estimated to be 26% higher compared to a no-interim EPA situation. Seychelles' total exports to the EU27 are estimated to be 573% higher compared to a no-interim EPA situation.

These numbers are generally mirrored by the estimates computed for the countries' overall economic activity (economic output, GDP). Importantly, no region experiences a reduction in aggregate economic output, which indicates that the EPA with the EU contributes to growth in ESA countries overall economic activity. Due to its economic size, for the EU the impact of the EPA on overall economic output is overall negligible but positive. As for the ESA countries, their GDP is estimated to be higher thanks to the agreement of 0.1% for Madagascar, 0.05% for Mauritius and 0.1% for Zimbabwe.

With regard to specific industries, ESA countries' agricultural and less knowledge-intensive (and less skill-intensive) manufacturing sectors are estimated to benefit most from tariff reductions that go beyond preceding preferential tariffs (Madagascar, Zimbabwe) and MFN tariffs (Mauritius) respectively, with the highest relative changes estimated for exports of "Sugar and sugar crops" for Mauritius and Zimbabwe. This result is even more relevant in consideration of the deep change in the sugar industry brought by the change in the EU sugar regime, and the consequent competitive pressures faced by ACP countries, including Mauritius. Similar results are estimated for "Fisheries and processed fish", a major export towards the EU for Mauritius.

Results from modelling also show a benefit from the interim EPA for "Other crops" industries, in both Mauritius and Zimbabwe. This sector is of particular importance for Zimbabwe, accounting for a relatively high share in the country's overall exports to the EU.

Similar results are estimated for "Fisheries and processed fish", a major export towards the EU for Mauritius. Similarly, the large increase of Seychelles exports to the EU is estimated to be driven by current trade and preferential gains in one tariff line of processed fish, i.e. 160414 (tuna, skipjack and bonito).

Exports of textiles are estimated to be significantly lower in the absence of the interim EPA, a result very significant for Mauritius, where the textile industry is of major importance. While the textile industry is very important for Madagascar as well, this country is estimated to benefit from the agreement only to a limited extent. As an LDC, it would benefit from preferential market access in goods markets to the EU.

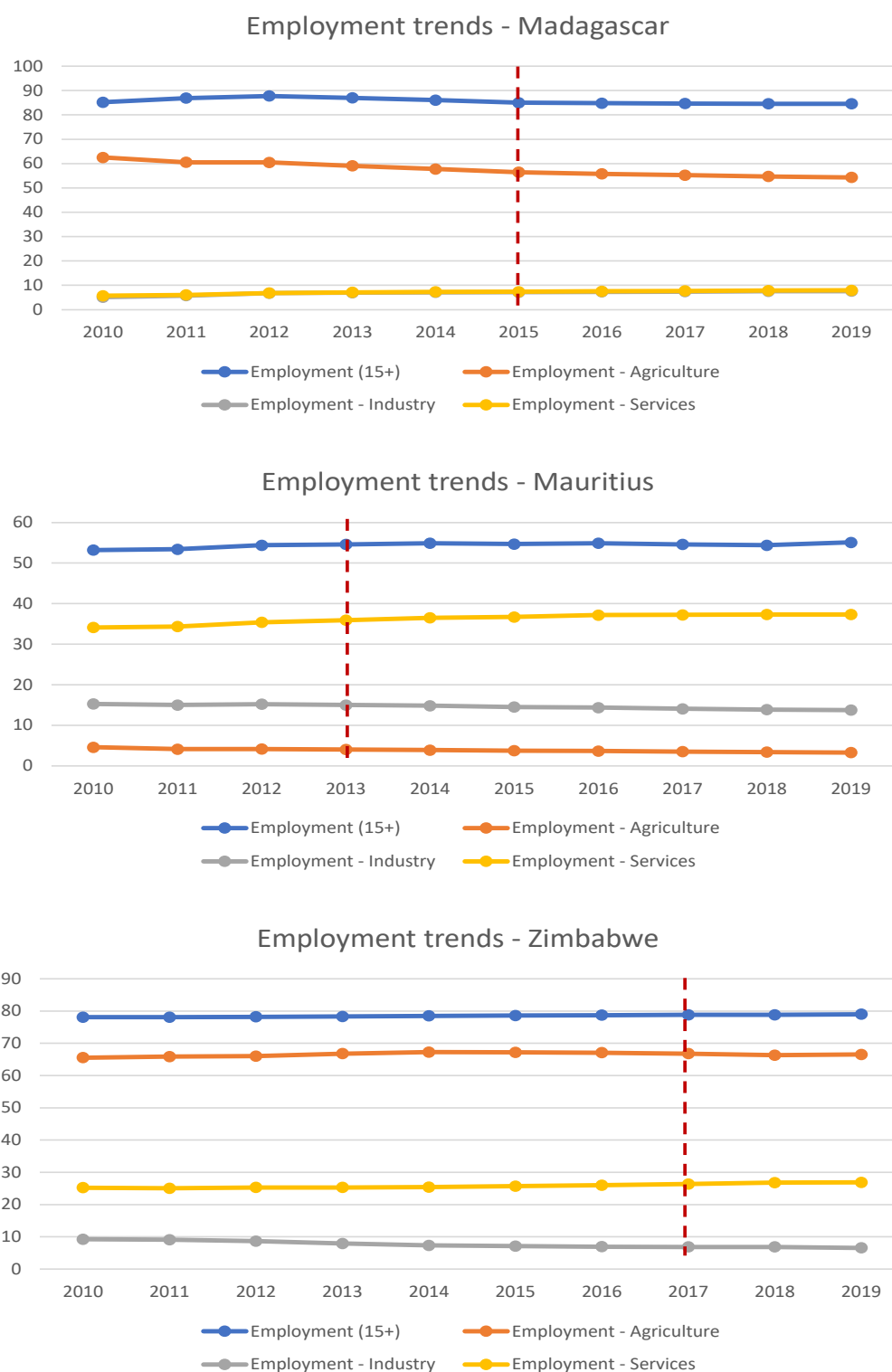
As concerns domestic sector output (overall production by domestic industries) in the EU and ESA countries, the impacts of the EPA are estimated to be relatively low, often negligible for most sectors of the economy, with exceptions in some industries. For instance, Mauritius' sugar products production is estimated to increase by 52.1% due to the EPA with the EU, Mauritius' fishery and seafood sector is estimated to gain 10.2%, and Mauritius' textiles sector is estimated to expand by 6.3% ("Textiles") and 5.7% ("Wearing apparel") due to the EPA. Madagascar's "Non-ferrous metals" sector is estimated to rise by 5.2% due to the EPA.

The impacts of the interim EPA are estimated to be negligible as well, except for Mauritius, where wages both skilled and unskilled labour wages in Mauritius' economy are estimated to rise by 1.7% and 0.8% respectively due to the EPA with the EU. As concerns the agreement's impact on prices, the estimates point to negligible impacts, ranging from -0.24% for Madagascar to +0.3% for Mauritius.

The modelling exercises do not provide estimates on the effects of the agreement of employment in the EU and the ESA countries. An approach could be that of using the results on output together with available statistics on employment in the countries to derive the likely effects of the employment agreement. However, we decided to discard these results. Such analysis is based on the key assumption that the changes in employment remain proportional to the changes in output, i.e. not allowing for changes in productivity and/or

technology, or other external factors. This assumption seemed too strong to be maintained, and could not be supported by data available from international sources used for validation.

Figure 28: Broad employment trends in ESA countries in the 2010-2019 period



Source: elaboration from ILO and World Bank data. Employment data for Seychelles are only available for 2019.

Note: Values for employment in Industry and Services in Madagascar are very similar, so that only one series (services) is visible. The complete data series is reported in section 2.2.1. The vertical line identifies the year in which the interim EPA entered into force in the country.

Employment trends in ESA countries

Overall employment data for the ESA5 countries show wide differences in employment rates (ranging in 2010-2019 from about 40% in Comoros to about 80% in Madagascar),¹²⁷ which have not changed notably in the period under consideration, either before or after the entering into force of the interim EPA in the countries.

Figure 28 above shows the evolution of employment in three of the ESA5 countries. As noted above, Comoros only joined the EPA in 2019 and thus is not a focus of this evaluation. Data for Seychelles are only available for 2019, so they are not included in the visuals.

While **agriculture** remains the main employer in Madagascar and Zimbabwe, there seems to be a progressive, even if slow, **shift towards the services sector**. For instance, in the 2010-2019 period, employment in services increased from 20.6% to 26.8% in Madagascar and from 62.6% to 68.6% in Mauritius, while the increase in Zimbabwe has been much more limited.

This limited shift can be attributed to a number of factors, including the increasing importance of tourism in many of the ESA5 countries, national governments' strategies aiming at diversifying economic development and reducing dependency on agriculture and mining products. For instance, the government of Seychelles decided to support the development of the financial sector,¹²⁸ while Zimbabwe announced policies aiming at focusing on the tourism¹²⁹ and ICT sectors¹³⁰ for differentiating their economy and reducing the dependency on agriculture.

When looking at the composition of the employed population, **female employment** is quite low in Madagascar and Zimbabwe (between 23% and 30% for the period), while it is far higher in Mauritius (ranging from about 73% to 80% in 2010-2019 period). However, when looking at the female presence within the different sectors of the economy, data show that in Madagascar and Seychelles the female presence is similar to the male one across all the broad economic sectors (with the tendency to be slightly higher in the services sector), while it is much lower (ranging from 25% to 35% of the male one) in Mauritius and Zimbabwe. The higher female presence in the services sector can be attributed to the importance of tourism in the economy of the ESA countries. Trend data show that while overall lower than male employment, female employment has increased more than male one over time.

Figure 29 below shows the evolution of employment by sector and per gender in three of the ESA5 countries. As noted above, Comoros only joined the EPA in 2019 and thus is not a focus of this evaluation. Data for Seychelles are only available for 2019, so they are not included in the visuals.

¹²⁷ ILO data: https://www.ilo.org/shinyapps/bulkexplorer54/?lang=en&segment=indicator&id=EMP_2WAP_SEX_AGE_RT_A

¹²⁸ A Financial Sector Development Implementation Plan (FSDIP) was launched in 2014, see:

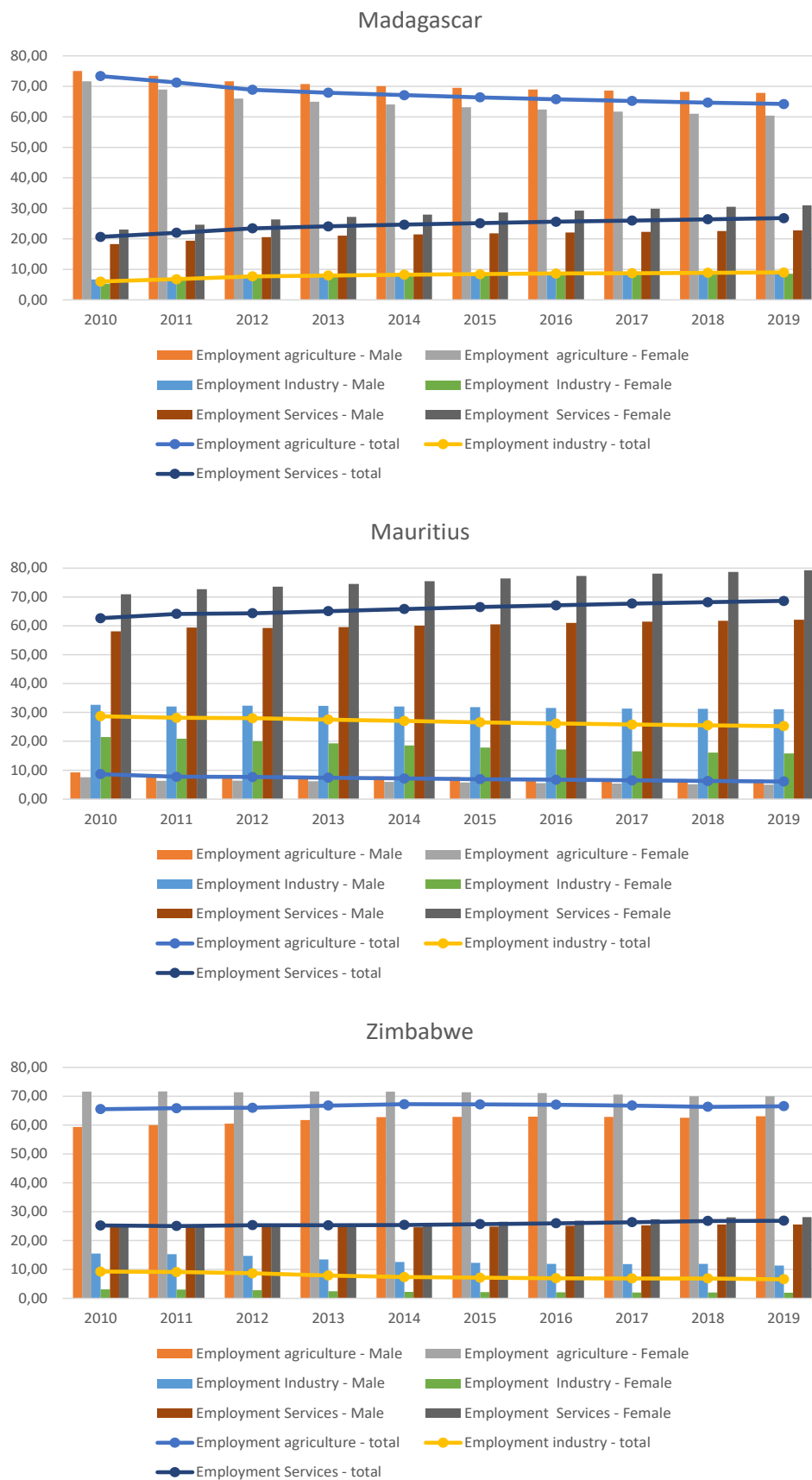
<http://documents1.worldbank.org/curated/en/983161468188662648/text/105775-AR-PUBLIC-FIRST-AR15-Final-low.txt>

¹²⁹ Zimbabwe Policy Analysis and Research Unit (2013), *Positioning the Zimbabwe Tourism Sector for Growth*, available at:

<http://www.zeparu.co.zw/sites/default/files/2018-03/Policy%20Brief%20Positioning%20the%20Zimbabwe%20Tourism%20Sector.pdf>

¹³⁰ Zimbabwe National Policy for Information and Communications Technology (ICT), (2016), available at:

https://en.unesco.org/creativity/sites/creativity/files/qpr/zimbabwe_national_policy_for_ict_2016_-_final_1.pdf

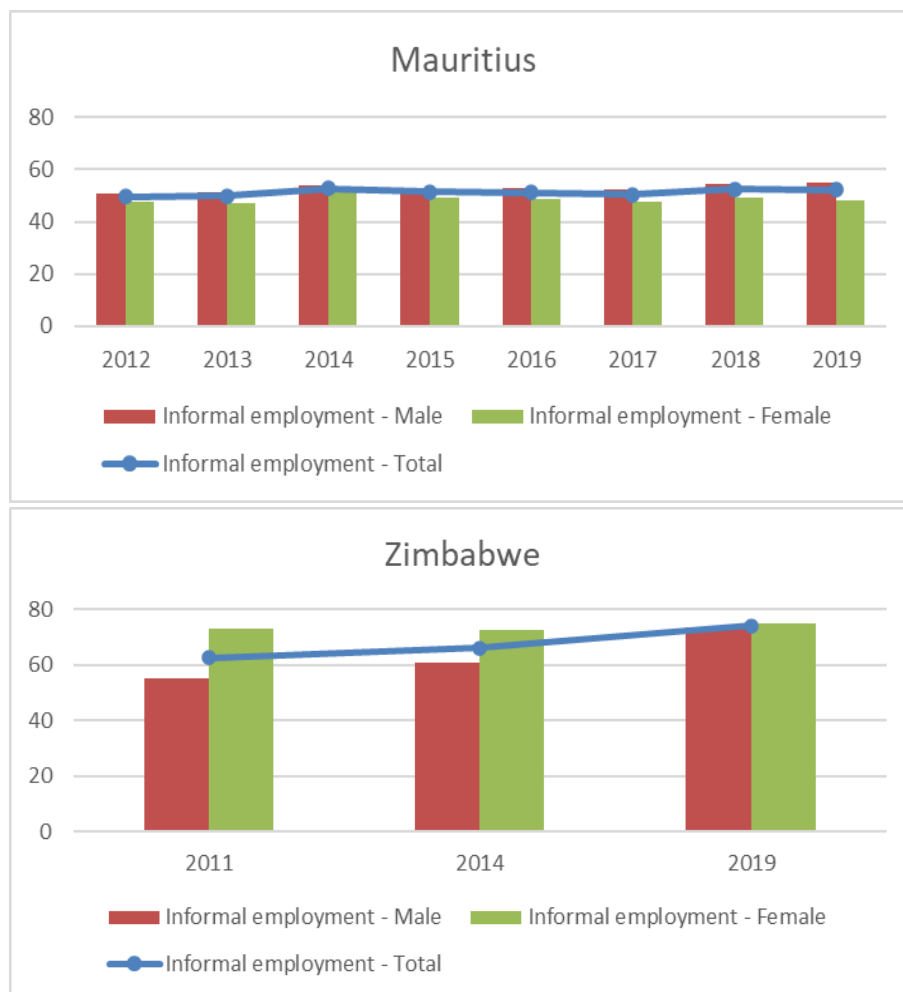
Figure 29: Employment trends per services and gender in ESA countries in the 2010-2019 period

Source: elaboration from ILO and World Bank data. Employment data for Seychelles are only available for 2019.

The share of **informal employment** in the economy is a particularly important parameter for developing countries, such as the ESA ones, for its links to the local economic context and the (expected) improvement brought by international trade and economic growth.¹³¹ Available data show that informal employment continues to play an important role in the economies of the ESA countries, where it exceeds 50% of the overall employment in all countries, with peaks of more than 80% in Madagascar and Zimbabwe. Furthermore, data show an increase of informal employment over time, more accentuated for female employment, in particular in countries where agriculture is the main employer (as in Madagascar and Zimbabwe).

Figure 30 below shows the evolution of informal employment in two of the ESA5 countries. As noted above, Comoros only joined the EPA in 2019 and thus is not a focus of this evaluation. Data for Madagascar are only available for 2015, so they are not included in the visuals, and data for Seychelles are not available.

Figure 30: Informal employment trends in Mauritius and Zimbabwe in the 2010-2019 period



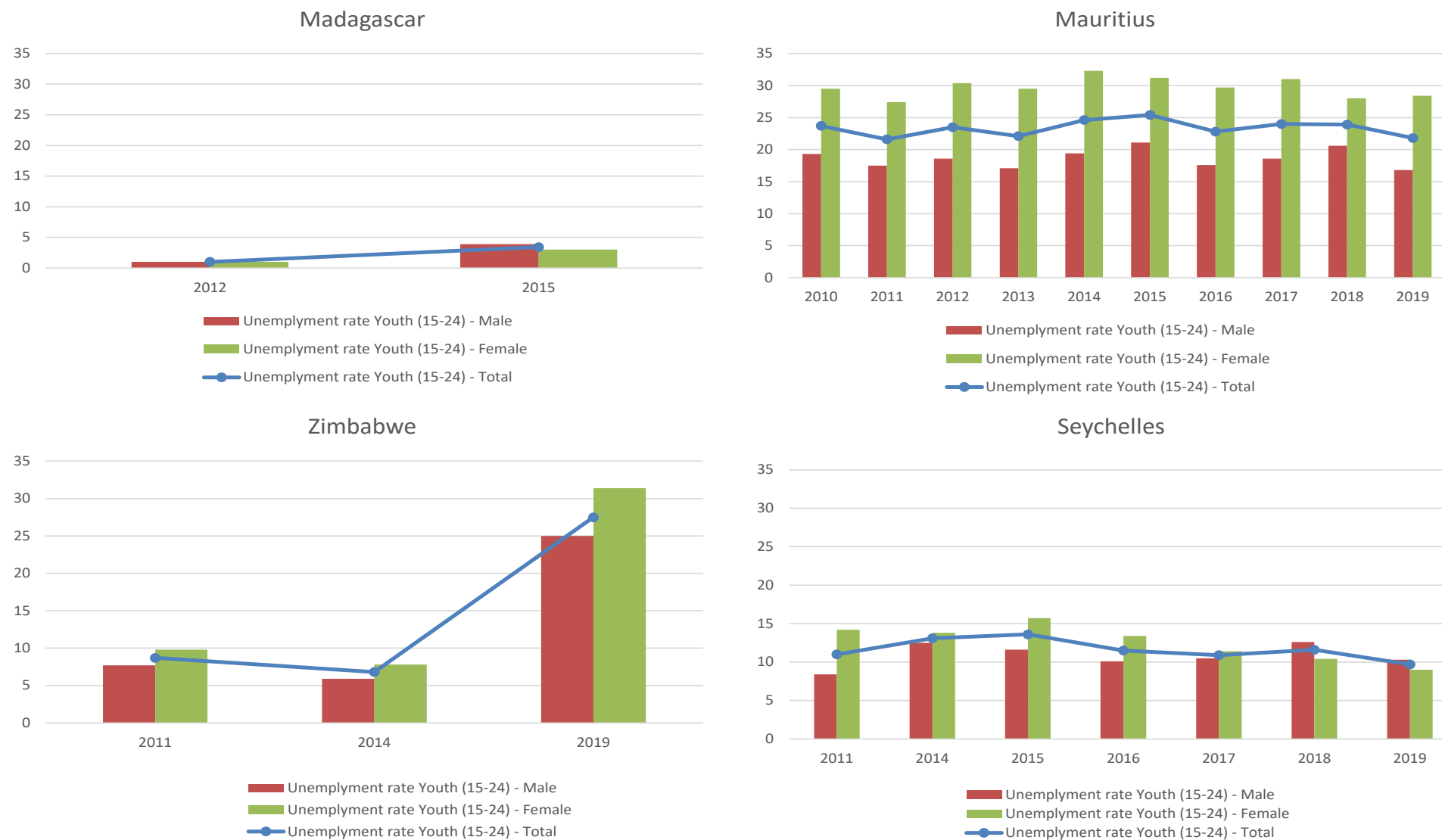
Source: elaboration from ILO and World Bank data. Data for Madagascar are only available for 2015 and data for Seychelles are not available.

¹³¹ Bacchetta M., Ekkehard E., Bustamante J.P., (2009), *Globalisation and Informal Jobs in Developing Countries*, Economic Research and Statistics Division World Trade Organization and International Institute for Labour Studies International Labour Office, available at: https://www.wto.org/english/res_e/booksp_e/jobs_devel_countries_e.pdf

While data on **unemployment** trends are less complete, the available evidence points towards an overall decrease of unemployment in the ESA countries over the period considered for the ex-post evaluation. Overall, unemployment is below 10% for all ESA countries, but higher for women than for men. For instance, while decreasing over time, female unemployment has been higher than male unemployment in Mauritius in the 2010-2019 period (it declined from 4.5% to 4.1% for men, and from 12.9 to 9.7% for women).

Statistics on **youth unemployment** (15-24 years old) are not complete for all the ESA5 countries and the whole timeframe for this evaluation. Nevertheless, available data for Madagascar, Mauritius, Seychelles and Zimbabwe show once again some heterogeneity across countries, with levels of youth unemployment much lower for Madagascar and Seychelles compared to the other two countries (lower than 5% in Madagascar and slightly above 10% for Seychelles compared to values higher than 20% in Mauritius and higher than 25% in Zimbabwe). Female youth unemployment is higher than male youth unemployment in all countries, similar to the unemployment rate for the adult female working-age population. Data are too scarce to identify clear trends in Madagascar and Zimbabwe. The latter registered a striking increase in 2019 compared to earlier years (27.5% total youth unemployment compared to 8.7% in 2011 and 6.8% in 2015), which can be attributed to the political instability and adverse climate events that affected the country. Data for Mauritius are more complete and show that youth unemployment rates remained essentially stable over the years (around 21.5% and 25.4% for the total youth unemployment, between 17% and 21% for male youth unemployment and between 28% and 32% for female youth employment). Similar, data for Seychelles show stable levels of youth unemployment over time, with a slight decrease in 2019 compared to the previous years.

Figure 31 below shows the evolution of youth unemployment in three of the ESA5 countries. As noted above, Comoros only joined the EPA in 2019 and thus is not a focus of this evaluation.

Figure 31: Youth unemployment trends in ESA countries in the 2010-2019 period

Source: elaboration from ILO and World Bank data. Data for Comoros are not available.

Data on **average earnings** show large differences across sectors in all ESA countries, with agriculture having lower average earnings than the other sectors of the economy in the whole 2010-2019 period, and services having higher average earnings. Data also show the persistence of a differential in average earnings between men and women across all sectors in all countries, which is particularly wide in agriculture, with female salaries more than three-time lower than male ones. However, there is some evidence of a progressive reduction of such differentials, especially in some ESA countries. For instance, the average earnings for female workers in Mauritius raised from about 46% in 2011 to 55% of the male workers' salaries in 2019.

Such trends in employment are linked to several elements: national strategies, supported to some extent by the interim EPA implementation, demands for goods from the EU and other commercial partners (such as China and the US), political instability in the countries (such as Madagascar and Zimbabwe), and the consequences of the 2008-2009 financial crisis and the 2011-2012 EU debt crisis.

While the interim EPA aims at helping the ESA countries differentiating their economies and developing industry and (formal) employment, it can be argued that it is not possible to identify a direct causal link.

Focus on interim EPA's social and human rights impacts on specific sectors in ESA countries

The influence of the interim EPA becomes more evident when looking more closely at the main goods traded between the EU and the ESA countries, and in particular at the exports towards the EU. Data from trade flow analysis and the CGE modelling, combined with data for employment from international sources, allows identifying a set of issues pertaining to individual countries and/or traded goods, in which the implications of the interim EPA interact with other external factors, such as changes in world prices and demand for specific goods.

The analysis will thus focus on the trade of some industries, which are particularly important for individual ESA countries, and their social impacts, namely:

- Vanilla trade with Madagascar;
- Sugar trade with Mauritius and Zimbabwe;
- Tobacco trade with Zimbabwe;
- Textiles trade with Madagascar and Mauritius;
- Diamonds trade with Zimbabwe; and
- Fisheries and processed fish products trade with Seychelles and Madagascar.

It should be pointed out that many of the industries and ESA countries listed above are the same identified as those having most benefitted from the interim EPA by the CGE modelling and PE model exercises.

Agriculture

Agriculture remains a crucial sector for all ESA5 countries, and some critical issues concern indeed agriculture products. A significant part of agri-food goods is exported from Madagascar, Mauritius, and Zimbabwe to the EU. Between 2010 and 2019, coffee, tea, cocoa and spices, and vegetables and fruits were amongst the top four goods exports to the EU from Madagascar (after apparel and clothing accessories).¹³² Vanilla has been a significant export to the EU from Madagascar, representing 74% of the vanilla imported by the EU in 2017¹³³. Between 2015 and 2019, Zimbabwe's top exports to the EU were tobacco, vegetables and fruits, and sugar. In 2019, tobacco accounted for 52.7% of all agri-food exports to the EU, while vegetables and fruits

¹³² EU, 'Agri-food Trade Statistical Factsheet. European Union – Madagascar' (17 March 2020).

¹³³ See: <https://www.cbi.eu/market-information/spices-herbs/vanilla>

represented 25.5% of all agri-food exports to the EU.¹³⁴ Mauritius is a major exporter of sugar to the EU. Sugar has been Mauritius' main agri-food commodity export in the last decade, accounting for 72.8% of all agri-food exports to the EU in 2019.¹³⁵ The EU also exports agri-food products to ESA countries. Since 2015, meat has been the EU's top good export to Comoros. In 2019, the export of poultry meat represented 50% of all EU exports of agri-food products to Comoros.¹³⁶

Vanilla trade with Madagascar

Trade flows data clearly show that production and **export of agricultural products, and vanilla, in particular, are a key element of the economy in Madagascar**, and especially of exports towards the EU¹³⁷. The large increase in value of vanilla trade in the 2009-2016 period, not corresponding to a similar increase in the volume of trade, is related to a steep increase in price. The price of vanilla is very volatile but, in the past years, has been rising constantly, rarely failing below US\$ 400/kilo, and with a peak close to US\$ 600 in 2018¹³⁸. The increase in vanilla prices are due to external factors, and it is not clear the extent to which the interim EPA itself has affected these exports to the EU. While overall employment in the agriculture sector has declined over time, employment in growing crops (including vanilla) shows a (limited) increase over time, and higher earnings, which have been on the rise since 2015.¹³⁹

Despite such positive elements, the production of vanilla has been linked to **child labour**. In 2012, the ILO estimated that around 20,000 children, aged 12 to 17 years old, worked in vanilla fields.¹⁴⁰ More recent reports indicated that child labour in the sector remains an issue.¹⁴¹ Children often work in difficult labour conditions, for long hours, perform dangerous tasks and receive extremely low salaries, if any. Some children are also kept out of school, drop out or downplay their studies to work in the vanilla sector.¹⁴² In 2017, the ILO found that when the price of vanilla rose, the school enrolment rate decreased in the SAVA region, which is the main region where vanilla is produced in Madagascar.¹⁴³

There is no strong evidence that child labour in the vanilla sector is the direct result of the interim EPA. Other factors, such as the price of the commodity, poverty and lower costs associated with child labour, play a crucial role. High vanilla beans prices seem to increase the incentive for child labour. Furthermore, many poor families are unable to afford school-related expenses and prefer to send their children to work in vanilla fields. However, given the share of EU imports for each of these agri-food products, it is likely that vanilla produced by children is imported into the EU. In addition, EU demand for vanilla and rising prices may create an incentive for more production at a lower cost. Moreover, according to some NGOs, there were reports of major European food

¹³⁴ Under vegetable and fruits, we include 1) vegetables, fresh, chilled and dried; 2) fruit, fresh or dried, excl. citrus and tropical fruits; 3) citrus fruit; and 4) tropical fruits, fresh or dried, nuts and spices. See EU, 'Agri-food Trade Statistical Factsheet. European Union – Zimbabwe' (17 March 2020).

¹³⁵ EU, 'Agri-food Trade Statistical Factsheet. European Union – Mauritius' (17 March 2020).

¹³⁶ EU, 'Agri-food Trade Statistical Factsheet. European Union – Comoros' (17 March 2020).

¹³⁷ EU, 'Agri-food Trade Statistical Factsheet. European Union – Madagascar' (17 March 2020).

¹³⁸ See: <https://www.bloomberg.com/features/2019-economics-of-vanilla-markets-madagascar/>

¹³⁹ ILO data on sectoral employment (ISIS 4 2-digit), available at:

https://www.ilo.org/shinyapps/bulkexplorer54/?lang=en&segment=indicator&id=EMP_2WAP_SEX_AGE_RT_A

¹⁴⁰ ILO-IPEC, 'Etat des lieux du travail des enfants dans la filière vanille dans la région SAVA 2011' (2012).

¹⁴¹ US Department of Labor, '2020 List of Goods of Produced by Child Labor or Forced Labor' (2020).

¹⁴² ACAT Madagascar, 'Rapport de la société civile sur la mise en œuvre du Pacte international relatif aux droits civils et politiques (PIDCP) (Réponses à la liste de points à traiter CCPR/C/MDG/Q/4) A soumettre pour l'examen du quatrième rapport périodique de Madagascar (CCPR/C/MDG/4) à la 120ème session du Comité des droits de l'homme (juillet 2017)' (June 2017), available at https://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/MDG/INT_CCPR_CSS_MDG_27612_F.pdf

¹⁴³ ILO, 'US Department of Labor supports the development of a sustainable vanilla sector in Madagascar, available at: https://www.ilo.org/ipecc/news/WCMS_554937/lang-en/index.htm

companies witnessing child labour without reporting it or neglecting to complete appropriate risk assessments with their suppliers.¹⁴⁴

At the same time, there have been initiatives to prevent child labour in the vanilla sector. Several EU development cooperation projects aimed at supporting SMEs in the whole IOC area, including Madagascar.¹⁴⁵ While these projects are not directly related to the trade agreement, they are expected to create synergies that will help increase the productivity of the sector while promoting better working conditions. The Malagasy government has also taken measures to limit the fluctuation of the price of vanilla,¹⁴⁶ which is very volatile and has maintained very high values in the last years. Furthermore, private sector initiatives involving European companies exist as well to foster the sustainability of the supply chain in the vanilla sector and reduce poverty.¹⁴⁷

Sugar trade with Mauritius

The interim EPA includes provisions on sugar (Annex I), which impose Most Favoured Nation duties on the defined quantity of sugar from ESA countries for the 2009-2015 period. However, the main changes affecting the trade of this commodity happened outside of the agreement. While **sugar has had crucial importance for the economic growth of Mauritius in the previous decades**, the recent change in the EU/ACP countries sugar regime has led to a large reduction in the volumes and values of exports towards the EU¹⁴⁸. Up until 2009, Mauritius' exports of sugar benefited from guaranteed access for fixed quantities at above-market prices to the EU market under the ACP/EU Sugar Protocol. Mauritius was the biggest quota holder among the ACP countries, with a 37% share. While the phasing out of this regime, market prices have been gradually introduced, with the abolition of reserved quotas for Mauritian sugar in 2017. Furthermore, all LDCs (under the Everything but Arms scheme) and ACP countries (who have negotiated European Partnership Agreements with the EU) now have duty-free market access to the EU market. In addition, in 2017, the EU ended the sugar quota system, which means that EU sugar producers are now able to supply a greater share of internal market demand at the expense of imports.¹⁴⁹ This has exposed the Mauritian sugar sector to competition from other developing countries, including Least Developed Countries (LDCs) and ACP countries that have duty-free market access to the EU market via other European Partnership Agreements and low-tariff access via the GSP, and to major, lower-cost producers such as Brazil. The end of the EU sugar regime caused a drastic sugar price reduction of 36% for Mauritius, which lead to major consequences for the sector.¹⁵⁰

The decline in the economic weight of the sugar sector is reflected in a **fall in employment in the agriculture sector and of corresponding salaries**, which declined strongly after 2011. Before and outside of the interim EPA, Mauritius (also supported by the EU) implemented several **policy measures to counteract** the implications of the reform of the EU sugar regime, starting in 2001 with the Sugar Industry Strategic Plan

¹⁴⁴ Verité, 'Summary of Key Trafficking in Persons Issues in Vanilla Production', available at <https://www.verite.org/africa/explore-by-commodity/vanilla/>

¹⁴⁵ See for instance projects on Enhancing Entrepreneurship and Business Cooperation Project in the IOC region (<https://ec.europa.eu/transparency/regdoc/rep/3/2019/EN/C-2019-7496-F1-EN-ANNEX-5-PART-1.PDF> and <https://ec.europa.eu/transparency/regdoc/rep/3/2019/EN/C-2019-7496-F1-EN-ANNEX-5-PART-1.PDF>

¹⁴⁶ <https://www.rfi.fr/fr/afrique/20200225-fin-campagne-vanille-%C3%A0-madagascar-prix-questionnent>

¹⁴⁷ <https://livelihoods.eu/portfolio/madagascar-a-resilient-vanilla-supply-chain-with-farmers/>

¹⁴⁸ Sakwut R., Tandrayen V., Boopen S. Vinesh S., (2009), *Trade and Poverty in Mauritius: Impact of EU Sugar Reform on the Livelihood of Sugar Case Workers, Trade and Industrial Policy Strategies*, available at:

https://www.researchgate.net/publication/292891660_Bitter_EU_sugar_reforms_for_mauritius_A_gender_perspective

¹⁴⁹ WTO, 'Trade Policy Review. Report by the Secretariat. Mauritius' (17 September 2014) WT/TPR/S/304; LMC, 'The Economic, Social and Environmental Impact on Mauritius of Abolition of Internal Quotas of Sugar in EU Market, Report for Ministry of Agro Industry and Food Security Mauritius' (May 2015).

¹⁵⁰ Sakwut R., Tandrayen V., Boopen S. Vinesh S., (2009), *Trade and Poverty in Mauritius: Impact of EU Sugar Reform on the Livelihood of Sugar Case Workers, Trade and Industrial Policy Strategies*, available at:

https://www.researchgate.net/publication/292891660_Bitter_EU_sugar_reforms_for_mauritius_A_gender_perspective

(2001-2005) and continued 2005 with the Multi-Annual Action Plan (MAAS), for the 2005-2015 period.¹⁵¹ Among the different measures, a restructuring of costs for the sector, which lead to the reduction of the number of sugar factories and of workers, improvement in the energy efficiency to lower production costs and increase competitiveness, optimising the use of by-products of the cane sugar processing to produce ethanol and a Voluntary Retirement Scheme (VRS) to support low-income groups of the sugar industry. These measures have led to lower production of cane sugar, closing of mills and processing factories, restructuring of production to more added-value types of sugar,¹⁵² and research for increasing productivity and business support.¹⁵³ Evidence shows that the effectiveness of these measures, and the VRS in particular, has been limited, and women have been more adversely affected.¹⁵⁴ Most of the beneficiaries have seen their income decreasing, while the re-training (which is part of the programme) was delayed. However, data from the Commission's CGE modelling seem to suggest that the decline of the sector and the negative repercussions on employment would have been even higher in the absence of the agreement.

Tobacco trade with Zimbabwe

In a somewhat similar dynamics, **exports of unmanufactured tobacco from Zimbabwe towards the EU have seen a decline in the last decade, despite a sustained world demand and price for the item.**¹⁵⁵ EU countries such as Germany and Belgium are still major importers of unmanufactured tobacco from Zimbabwe.¹⁵⁶ The production of tobacco in Zimbabwe has increased over time, and exports have shifted towards other commercial partners, such as China and Indonesia.¹⁵⁷ In addition, the country has suffered the consequences of high political instability and adverse climate events, which have further negatively impacted production, exports, employment, and salaries. The lower economic weight of tobacco (the most important agricultural product exported) is reflected in employment data for the crops sector, which has seen a strong decline from 2010 to 2019 (halved value). The impact has been particularly strong on wages. Wages and working conditions are negotiated at the central level, through the National Employment Council (NEC) for the Agriculture sector, which includes employers' organisations and trade unions in the agriculture sector. Data for the 2011-2016 period show that agriculture wages have failed to maintain their level with respect to the Food-Poverty-Line (FPL) and the Poverty Datum Line (PDL - the equivalent of a living wage, the minimum amount required per month for a family of five to sustain their livelihood).¹⁵⁸ Most of the production (about 87%) is carried out by few companies, which employ a local workforce (also including a large share of children).¹⁵⁹

There have been reports of child labour in the tobacco sector in Zimbabwe.¹⁶⁰ Many children under 18 work in hazardous conditions on tobacco farms in Zimbabwe, often performing tasks that threaten their health and safety, such as mixing, handling, and spraying pesticides, or interfere with their education, as children drop out of school to work on tobacco farms. Children also experience adverse health effects related to exposure

¹⁵¹ Tandrayen-Ragoobur, V. (2012). *Bitter EU sugar reforms for Mauritius: A gender perspective*. 171-183. Available at: https://www.researchgate.net/publication/292891660_Bitter_EU_sugar_reforms_for_mauritius_A_gender_perspective

¹⁵² See: <https://chamber-of-agriculture.mu/agriculture-in-mauritius/sugar-sector/>

¹⁵³ Kwong, R.N.G.K. *Status of sugar industry in Mauritius: Constraints and future research strategies*. *Sugar Tech* 7, 5–10 (2005), available at: <https://doi.org/10.1007/BF02942411>

¹⁵⁴ Tandrayen-Ragoobur, V., *ibid*,

¹⁵⁵ See: <http://www.fao.org/3/y4997e/y4997e0k.htm>

¹⁵⁶ See: <https://www.herald.co.zw/china-drives-zim-tobacco-exports/>

¹⁵⁷ Tandrayen-Ragoobur, V. (2012). *Bitter EU sugar reforms for Mauritius: A gender perspective*. 171-183. Available at: https://www.researchgate.net/publication/292891660_Bitter_EU_sugar_reforms_for_mauritius_A_gender_perspective

¹⁵⁸ Chakanya N. (2016), *Working and living conditions of Workers in the Agricultural sector in Zimbabwe*, available at: <https://globalizationandhealth.biomedcentral.com/track/pdf/10.1186/s12992-015-0139-3.pdf>

¹⁵⁹ UN Special Rapporteur on the right to food, 'Visit to Zimbabwe' (27 March 2020) UN Doc A/HRC/43/44/Add.2.

¹⁶⁰ The UN Committee on the Right of the Child and the ILO have expressed concerns about the general persistence in Zimbabwe of child labour, including hazardous labour, in various sectors, including the agricultural sector. See UN Committee on the Rights of the Child, 'Concluding observations on the second periodic report of Zimbabwe' (7 March 2016) UN Doc CRC/C/ZWE/CO/2; ILO CEACR, 'Observations. Minimum Age Convention, 1973 (No. 138) – Zimbabwe (Ratification: 2000)', adopted 2016, published 106th ILC session (2017).

to nicotine.¹⁶¹ Overall, child labour has a negative impact on the well-being and human rights of children. In particular, it interferes with their right to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with their education, or to be harmful to their health or physical, mental, spiritual, moral or social development, as recognised by Article 32 of the UN Convention on the Rights of the Child.

In addition to the employment and child labour implications, there is evidence showing how tobacco workers face low protection from nicotine poisoning and pesticides. Large farms and processing factories fail to implement correct OSH protocols and training, and there are reports of workers not being provided with adequate protective equipment.¹⁶² Even in this case, the interim EPA seems to be only one of the explaining factors, rather than the direct cause of such impacts. EU development cooperation projects aimed at supporting the agricultural sector in Zimbabwe, in a manner that promotes inclusive green economic growth.¹⁶³ While not directly related to the trade agreement, these projects are expected to create synergies that will help increase the productivity of the sector while promoting better working conditions.

There is no strong evidence that child labour and labour rights violations are the direct result of trade in tobacco with the EU. However, given the share of EU imports for this agri-food product, it is likely that tobacco produced by children or in violation of labour rights is imported into the EU.

Sugar trade with Zimbabwe

There have also been reports of child labour in the sugarcane sector in Zimbabwe.¹⁶⁴ It is estimated that around 10,000 children work on sugarcane farms. Children perform tasks related to irrigation, the cutting of sugarcane, and guarding crops. They perform work at night and engage in hazardous activities, such as using machetes and chasing away wild animals. Many child labourers working in sugarcane production do not attend school because of their work.¹⁶⁵ Child labour in the sugarcane sector in Zimbabwe also infringes on the realisation of Article 32 of the UN Convention on the Rights of the Child.

There is no strong evidence that child labour is the direct result of trade in sugar with the EU. However, given the share of EU imports for this agri-food product, it is likely that sugar produced by children is imported into the EU.

Right to food in ESA countries and trade of agri-food products

We explored the **potential interference of the interim EPA with the right to food in all ESA countries**. The realisation of the right to food is a source of concern in all five ESA countries. However, it is **particularly problematic in Madagascar and Zimbabwe**.

In **Madagascar**, the prevalence of undernourishment went from 30.7% in 2012 to 41.7% in 2018. According to the 2018 Multiple Indicator Cluster Survey, the rate of acute malnutrition was 6% and the rate of chronic malnutrition was 42%, making Madagascar the 10th worst country affected by stunting in the world. In 2019,

¹⁶¹ Human Rights Watch, 'A Bitter Harvest. Child Labor and Human Rights Abuses on Tobacco Farms in Zimbabwe' (2018); US Department of Labor, '2020 List of Goods of Produced by Child Labor or Forced Labor' (2020).

¹⁶² Human Rights Watch (2018): <https://www.hrw.org/news/2018/04/05/zimbabwe-tobacco-work-harming-children>

¹⁶³ For instance, projects implemented under the Zimbabwe Agricultural Growth Programme (ZAGP)

¹⁶⁴ The UN Committee on the Right of the Child and the ILO have expressed concerns about the general persistence in Zimbabwe of child labour, including hazardous labour, in various sectors, including the agricultural sector. See UN Committee on the Rights of the Child, 'Concluding observations on the second periodic report of Zimbabwe' (7 March 2016) UN Doc CRC/C/ZWE/CO/2; ILO CEACR, 'Observations. Minimum Age Convention, 1973 (No. 138) – Zimbabwe (Ratification: 2000)', adopted 2016, published 106th ILC session (2017).

¹⁶⁵ US Department of Labor, '2020 List of Goods of Produced by Child Labor or Forced Labor' (2020).

the Economist's Global Food Security Index ranked Madagascar 108th out of 113 countries.¹⁶⁶ In Zimbabwe, the prevalence of food insecurity has increased in the last decade. In 2015, 64.7% of the population was classified as moderately or severely food insecure (i.e., living in a household that is unable to obtain enough food to meet basic needs). Ever since then, the situation has worsened. In 2018, 66.7% of the population suffered from moderate to severe food insecurity¹⁶⁷ and 34.2% of the population suffered from severe food insecurity.¹⁶⁸ In its 2020 report, the UN Special Rapporteur on the right to food estimated that 8 million people needed urgent action to save their livelihoods.¹⁶⁹ The current food crisis in Madagascar and Zimbabwe results from a number of factors, including extreme poverty, poor agricultural productivity, natural disasters and recurrent droughts, and corruption.¹⁷⁰ Political instability, economic crisis, currency devaluation, and spiralling inflation have also contributed to the current food crisis in Zimbabwe.¹⁷¹ The effects of the ongoing COVID-19 pandemic have also exacerbated the food crisis in both countries, most notably by disrupting food systems and restricting migration in search of new income opportunities.¹⁷² As a result, Madagascar and Zimbabwe are currently on the verge of famine.

An analysis of agri-food products trade between the EU, and Madagascar and Zimbabwe did not indicate that the implementation of the interim EPA had contributed to the food crisis or reduced affordability of certain food in either country.

Agriculture is the backbone of Madagascar and Zimbabwe's economy. It is the main source of subsistence for most of the population. However, agricultural productivity is low in both countries. They do not produce enough of their main staple food (rice in Madagascar; maize in Zimbabwe) and must therefore import it to ensure food security.¹⁷³ Food imports can nonetheless create tensions with the realisation of the right to food. For example, high tariffs on food imports can have a negative impact on food security by rising consumer prices and restricting access to basic food commodity for the poorest segments of the population. In this context, we assessed whether the EU played a role in food imports to these countries.

Madagascar does not import its main staple food from the EU. It imports rice mainly from Asian countries. However, at the same time, it exports some of the rice it produces. In 2019, 56% of Madagascar's rice was exported to Comoros and 43% to France.¹⁷⁴ Such rice exports do not however seem to have a significant negative effect on access to rice. They remain relatively small compared to rice imports, and rice produced in Madagascar is generally more expensive than imported rice. Another factor to consider is that rice exports are likely to be a source of revenue for the country.¹⁷⁵ In the past, Madagascar suspended rice exports. However, such suspension measures were not adequately enforced by customs authorities.¹⁷⁶

¹⁶⁶ The Economist, 'Madagascar', Global Food Security Index, available at

<https://foodsecurityindex.eiu.com/Country/Details#Madagascar>

¹⁶⁷ World Bank, 'Prevalence of moderate or severe food insecurity in the population (%) - Comoros, Madagascar, Mauritius, Seychelles, Zimbabwe', available at <https://data.worldbank.org/indicator/SN.ITK.MSFI.ZS?locations=KM-MG-MU-SC-ZW>

¹⁶⁸ World Bank, 'Prevalence of moderate or severe food insecurity in the population (%) - Comoros, Madagascar, Mauritius, Zimbabwe', available at <https://data.worldbank.org/indicator/SN.ITK.MSFI.ZS?locations=KM-MG-MU-SC-ZW>

¹⁶⁹ UN Special Rapporteur on the right to food, 'Visit to Zimbabwe' (27 March 2020) UN Doc A/HRC/43/44/Add.2.

¹⁷⁰ UN Special Rapporteur on the right to food, 'Visit to Zimbabwe' (27 March 2020) UN Doc A/HRC/43/44/Add.2.

¹⁷¹ UN Special Rapporteur on the right to food, 'Visit to Zimbabwe' (27 March 2020) UN Doc A/HRC/43/44/Add.2.

¹⁷² WFP, 'How COVID-19 is threatening food security and nutrition in Madagascar' (July 2020); WFP, 'WFP urgently seeks international support to prevent millions of Zimbabweans plunging deeper into hunger' (30 July 2020), available at <https://www.wfp.org/news/wfp-urgently-seeks-international-support-prevent-millions-zimbabweans-plunging-deeper-hunger>

¹⁷³ WTO, 'Trade Policy Review. Report by the Secretariat. Zimbabwe' (19 February 2020) WT/TPR/S/398.

¹⁷⁴ TrendEconomy, 'Madagascar | Imports and Exports | World | Rice | Netweight (kg); Quantity and Value (US\$) | 2008 – 2019', available at <https://trendeconomy.com/data/h2/Madagascar/1006>

¹⁷⁵ J. Nimarkoh, S. Koroma and M. Sablah, 'Linking trade and food and nutrition security in Indian Ocean Commission member states' (FAO Regional Office for Africa, 2017).

¹⁷⁶ WTO, 'Trade Policy Review. Report by the Secretariat. Madagascar' (9 June 2015) WT/TPR/S/318.

Zimbabwe imports maize from South Africa.¹⁷⁷ However, wheat, which is the second most important cereal for national food security in Zimbabwe,¹⁷⁸ has been imported from the EU over the years and accounted for 30.8% of Zimbabwe's agri-food imports from the EU in 2019.¹⁷⁹ Zimbabwe's import tariffs for agricultural commodities, such as wheat, are very high. As mentioned above, high import tariffs on wheat are likely to lead to higher prices for consumers and limit affordability and accessibility to basic food commodity. An analysis of the retail price of wheat flour on markets in Zimbabwe showed that the price of wheat remained low and stable (under Z\$1 per kilogram) from 2012 until September 2018.¹⁸⁰ However, prices of wheat flour began to soar in October 2018, with sharper increases between April and August 2019. The price of wheat flour is currently at one of its highest points. However, such a price increase does not seem to be linked to wheat imports from the EU. According to the FAO, the extreme price increases have been mostly driven by the depreciation of the national currency as well as the reduced domestic supplies of grain, due to the below-average harvest and shortages of foreign currency reserves that have curbed the country's capacity to import.¹⁸¹ Nonetheless, it should be pointed out that, to ease pressure on import prices, the government temporarily suspended import tariffs on wheat and maize products from May 2020.¹⁸²

Mining

Mining is relevant here in terms of trade of minerals between the EU and ESA countries, mainly Madagascar and Zimbabwe, as well as in terms of development cooperation.

Diamonds trade with Zimbabwe

The mining sector accounts for about 12% of the country's gross domestic product (GDP) and top minerals include gold, platinum, chrome, coal, diamonds, and lithium.¹⁸³ Diamonds are an important sector of the Zimbabwean mining industry (2.2% of the country's GDP in 2012),¹⁸⁴ and the EU represents important trade partners (however, recent data on the volume and value of the diamond trade with the EU are not available). The international trade of diamonds provides important revenues for the government. However, the 2013 national budget for Zimbabwe shows that Treasury only received US\$41 million from diamond mining in 2012.¹⁸⁵

The diamonds sector is also a very opaque industry, where human rights violations have been reported since the 1990s and persist to this day.¹⁸⁶ A World Bank survey reported that the Marange and Chimanimani diamonds are identified by stakeholders as the major source of opaqueness in mining revenue transfers in the country. Diamonds extracted from these mines are under EU and the United States sanctions which make it difficult to attract reputable companies to participate in their development, and for those companies that are currently active to participate in improved transparency initiatives such as the ZMRTI¹⁸⁷

¹⁷⁷ TrendEconomy, 'Madagascar | Imports and Exports | World | Rice | Netweight (kg); Quantity and Value (US\$) | 2008 – 2019', available at <https://trendeconomy.com/data/h2/Madagascar/1006>; Eric Oteng, 'Zimbabwe corn imports reaches 11-year high', Africanews (08 February 2020), available at <https://www.africanews.com/2020/02/08/zimbabwe-corn-imports-reaches-11-year-high/>

¹⁷⁸ WTO, 'Trade Policy Review. Report by the Secretariat. Zimbabwe' (19 February 2020) WT/TPR/S/398.

¹⁷⁹ EU, 'Agri-food Trade Statistical Factsheet. European Union – Zimbabwe' (17 March 2020).

¹⁸⁰ Data from FAO's GIEWS FPMA Tool, available at <https://fpma.apps.fao.org/giews/food-prices/tool/public/#/dataset/domestic>

¹⁸¹ FAO, 'GIEWS Country Brief. Zimbabwe' (16 October 2019).

¹⁸² FAO, 'GIEWS Country Brief. Zimbabwe' (25 June 2020).

¹⁸³ See: <https://www.trade.gov/country-commercial-guides/zimbabwe-mining-and-minerals>

¹⁸⁴ IMF (2014) 'Implementing AML/CFT Measures in the Precious Minerals Sector: Preventing Crime While Increasing Revenue', available at: <https://www.imf.org/external/pubs/ft/tnm/2014/tnm1401a.pdf>

¹⁸⁵ IMF (2014) 'Implementing AML/CFT Measures in the Precious Minerals Sector: Preventing Crime While Increasing Revenue', available at: <https://www.imf.org/external/pubs/ft/tnm/2014/tnm1401a.pdf>

¹⁸⁶ Kimberley Process Civil Society Coalition, 'Real Care is Rare' (2019).

¹⁸⁷ Piffaretti, N.F. (2014) 'Zimbabwe - Economic policy dialogue : policy notes for the new government', Washington, DC: World Bank Group

The diamond mining in Marange, a region estimated to hold between 25 and 30% of the world's diamond deposits, is the latest example of the human rights issues related to this industry. Since the mid-2000s, it is estimated that 15,000-20,000 illegal artisanal miners started working on small plots in the area by mid-December 2006, and shortly after water, sanitation and housing crisis developed. This developed a black market and a Kimberley Process review mission voiced concerns over perceived government involvement in HR abuse when visiting the site in 2009.¹⁸⁸

The development of these operations has also been characterised by turmoil and legal controversies between private mining companies and the government of Zimbabwe. As of February 2014, the diamond fields are operated by seven private entities all of which are partnered with the Zimbabwe government under the affiliate Zimbabwe Mining Development Corporation (ZMDC). The seven companies currently operating are Marange Resources, Anjin Investments Ltd., Diamond Mining Company, Gyn Nyame Resources, Jinan Mining Ltd., Kusena Diamonds, and Mbada Diamonds.¹⁸⁹

There have been many allegations of human rights violations in the Marange diamond mine, many of which committed to civilians and illegal miners since diamonds were discovered in the region. Such abuses often saw the intervention of the army and the police, as well so mining companies and private security companies. There are reports of police and army interventions to drive out illegal miners using killings, torture, beatings, and harassment, and the national government has been accused of forcibly displacing villagers to make way for diamond mining.¹⁹⁰

The exploitation of the Marange diamond mine has also been linked to the political instability that invested the country in the last years. There have been allegations about the use of the army to secure revenues from the Marange mines to fund the Zimbabwe African National Union-Patriotic Front (ZANU-PF) party of President Mugabe and some of its senior members (including the President) and of the army high-ranking officials in the 2008-2014 period, which was also connected to violations of fundamental rights.¹⁹¹

The interim EPA does not include provisions on diamonds per se, and both the EU and Zimbabwe participate in the Kimberly Process, which through its Certification Scheme aims at preventing conflict diamonds from entering the legitimate trade.¹⁹² Nevertheless, there have been instances, even recently, of 'blood diamonds' imported and seized in the EU, from countries such as Ivory Coast and Sierra Leone (a "landmark" case, because it was the first time an individual resulted detained on international charges related to the exploitation of the war in Sierra Leone to market blood diamonds), and possibly Zimbabwe.¹⁹³

While it is not possible to link the diamond trade, and its human rights violations, to the interim EPA, it is not possible to exclude that some of the diamonds imported by the EU have been extracted by companies responsible for complicit in such violations.

¹⁸⁸ UNODC (2011) 'Organized Crime and Instability in Central Africa: A Threat Assessment', available at: http://www.unodc.org/documents/data-and-analysis/Studies/Central_Africa_Report_2011_web.pdf

¹⁸⁹ See: <http://www.mining.com/web/marange-may-not-be-the-worlds-largest-diamond-producer-for-much-longer/>

¹⁹⁰ HRW, 'Diamonds in the Rough Human Rights Abuses in the Marange Diamond Fields of Zimbabwe' (26 June 2009), available at <https://www.hrw.org/report/2009/06/26/diamonds-rough/human-rights-abuses-marange-diamond-fields-zimbabwe>; Global Witness, 'Return of the Blood Diamond. The deadly race to control Zimbabwe's new-found diamond wealth' (2015); HRW, 'Sparkling Jewels, Opaque Supply Chains

Jewelry Companies, Changing Sourcing Practices, and Covid-19' (24 November 2020), available at https://www.hrw.org/report/2020/11/24/sparkling-jewels-opaque-supply-chains/jewelry-companies-changing-sourcing#_ftn23

¹⁹¹ HRW, 'The Hidden Cost of Jewelry. Human Rights in Supply Chains and the Responsibility of Jewelry Companies' (8 February 2018), available at https://www.hrw.org/report/2018/02/08/hidden-cost-jewelry/human-rights-supply-chains-and-responsibility-jewelry#_ftn34

¹⁹² See : <https://www.kimberleyprocess.com/en/about>

¹⁹³ See: <https://www.unav.edu/web/global-affairs/detalle/-/blogs/blood-diamonds-keep-going-through-antwerp>

Mica trade in Madagascar

Child labour in the mining sector has been a concern in Madagascar. There have been reports that various minerals, including mica, sapphires, and stones, were produced by child labour in Madagascar.¹⁹⁴ An estimated 11,000 children work in the mica sector, including in constructing mines, extracting and sorting mica, and hoisting loads of mica out of mines.¹⁹⁵ The majority of this child labour is concentrated in the southern region of Madagascar where children underperform in terms of health, nutrition, and educational development.¹⁹⁶ Children are also involved in the mining of gold and sapphires. Children under the age of 10 are involved in mining. Children are exposed to harsh and unsafe working conditions which put their health at risk. They suffer from respiratory problems and diseases, such as diarrhoea and malaria, and are at risk of injury from collapsing mines. Children involved in stone quarrying use dangerous tools with no protection and work in the outdoor heat. Young girls are also vulnerable to commercial sexual exploitation around mining sites.¹⁹⁷ Child labour in mining interferes with the right of children to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with their education, or to be harmful to their health or physical, mental, spiritual, moral or social development, as recognised by Article 32 of the UN Convention on the Rights of the Child.

There is no clear evidence that child labour in mica mines results from the trade of mica with the EU. According to NGOs, China is by far the largest trading partner for the mica sector in Madagascar. In 2017, the trade with China accounted for 87% of all exports of mica in volume and 81% in value. However, EU countries were also destinations for mica from Madagascar. Estonia was the second-largest importer of mica from Madagascar, while France and Belgium were amongst the importers of Malagasy mica.¹⁹⁸ Given that half of the mica miners in Madagascar are children, there is a risk that EU countries import mica produced by child labour. In February 2020, the European Parliament adopted a resolution on child labour in mines in Madagascar in which it urged the Commission to clarify that no minerals produced by child labour were imported into the EU.¹⁹⁹ The European Parliament noted that the mica sector in Madagascar is taxed by means of a series of complex arrangements, with tax levels on exports being relatively low and not always providing direct benefit to mining communities. Furthermore, approximately only 40 export permits have been issued, thereby suggesting that the vast majority of mica mining is carried out illegally and in unregulated, precarious artisanal sites. In addition, the rise in exports combined with the significant decrease of the price per ton has aggravated the risk of labour exploitation.

Development cooperation in the mining sector

In the interim EPA, the Parties recognise the importance of cooperation in the development and management of the mining and minerals sectors.²⁰⁰ They agree to cooperate, including by facilitating support, in order to

¹⁹⁴ UN Special Rapporteur on Slavery, 'Mission to Madagascar (10 to 19 December 2012)' (24 July 2013) UN Doc A/HRC/24/43/Add.2; SOMO and Terre des Hommes, 'Child Labour in Madagascar's Mica Sector. Impact of the mica supply chain on children's rights from the Malagasy mines to the international product line' (2019); European Parliament Resolution of 13 February 2020 on child labour in mines in Madagascar (2020/2552(RSP)); US Department of Labor, '2020 List of Goods of Produced by Child Labor or Forced Labor' (2020).

¹⁹⁵ SOMO and Terre des Hommes, 'Child Labour in Madagascar's Mica Sector. Impact of the mica supply chain on children's rights from the Malagasy mines to the international product line' (2019); US Department of Labor, '2019 Findings on the Worst Forms of Child Labor: Madagascar' (2020); European Parliament Resolution of 13 February 2020 on child labour in mines in Madagascar (2020/2552(RSP)).

¹⁹⁶ European Parliament Resolution of 13 February 2020 on child labour in mines in Madagascar (2020/2552(RSP)).

¹⁹⁷ US Department of Labor, 'Child Labor and Forced Labor Reports', available at <https://www.dol.gov/agencies/ilab/resources/reports/child-labor/madagascar>. See also European Parliament Resolution of 13 February 2020 on child labour in mines in Madagascar (2020/2552(RSP)).

¹⁹⁸ SOMO and Terre des Hommes, 'Child Labour in Madagascar's Mica Sector. Impact of the mica supply chain on children's rights from the Malagasy mines to the international product line' (2019).

¹⁹⁹ European Parliament Resolution of 13 February 2020 on child labour in mines in Madagascar (2020/2552(RSP)).

²⁰⁰ interim EPA, Article 43(1).

improve health and safety standards in the mining industry.²⁰¹ A preliminary review of EU development cooperation programmes did not identify work in this field.

Textiles

Textiles trade with Madagascar and Mauritius

The **production and export of textiles is a very important trade item for both Madagascar and Mauritius**; they account for approximately 1/5 of Madagascar exports to the EU,²⁰² and they were the second top export goods of Mauritius to the EU in 2015 and 2019.²⁰³ The trade dynamics of textiles have been quite unstable in the last decade.

Trade data show a decrease in trade value for Madagascar for the 2009-2016 period, followed by an increase in the following years, accompanied by a less than proportional increase in quantities trade. Data for Mauritius report a reduction in both value and quantify of textiles over time, including since the entering into force of the interim EPA in 2017. Employment data in both countries show a decline over time, with employment in the manufacturing of textiles and wearing apparels falling from about 3% of total employment in 2012 to 1.5% in 2015 (last available year) in Madagascar, and from 11.1% in 2011 to 8.9% in 2019 in Mauritius.²⁰⁴ The agreement introduced the Single Transformation Rule of Origin,²⁰⁵ which provides more favourable conditions than the earlier Double Transformation Rule, which restricted the sourcing of raw materials to other ACP countries and the EU (please see the separate section on RoO).

The introduction of the Single Transformation RoO is expected to support the textiles industry in the ESA countries, and indeed the analysis from the CGE models indicates a stronger output with the agreement compared to the counterfactual situation. Such expected effect, however, is counter-balanced by a series of transformations in the textile sector that influence heavily the final outcome.

In the case of Mauritius, data show a constant decline in employment in the textile sector since 1999, and a strong decline of the economic weight of the sector, with a stable value of exports. The combination of such elements points to technological developments and thus higher market value. In addition, there has been an increasing share of migrants (mostly from Bangladesh, China and India) in the workforce in the sector. While the implications of such a heavy presence of migrant workforce on the local labour market are still debated²⁰⁶, they reply to the demand for low-skilled jobs in which the local population does not seem interested (literacy ratios for the population in Mauritius are quite high).²⁰⁷ The labour market in Mauritius is quite rigid, wages are agreed with collective bargaining among trade unions, business representatives and government, and wages in the more traditional sector (such as textile) and in emerging sectors (mostly in services) are relatively similar so that there is little incentive for workers to accept low-paid, low-skilled jobs.²⁰⁸

²⁰¹ interim EPA, Article 43(2)(d).

²⁰² See: https://wits.worldbank.org/CountryProfile/en/Country/MDG/Year/2015/TradeFlow/Export/Partner/by-country/Product/50-63_TextCloth

²⁰³ See: https://wits.worldbank.org/CountryProfile/en/Country/MUS/Year/2015/TradeFlow/Export/Partner/all/Product/50-63_TextCloth

²⁰⁴ ILO data: ILO data: https://www.ilo.org/shinyapps/bulkexplorer54/?lang=en&segment=indicator&id=EMP_2WAP_SEX_AGE_RT_A

²⁰⁵ This means that clothing companies in the ESA signatory countries can source fabrics from all over the world, undertake any operations and export to the EU market free of duty and quota restrictions, and same for imports

²⁰⁶ Chan Sun C.A., Dr. Chitto H. & Dr. Sukon KS. (2016), *The Labour Market: A Mismatch in the Clothing and Textile Industry in Mauritius*, available at: <https://globaljournals.org/item/6252-the-labour-market-a-mismatch-in-the-clothing-and-textile-industry-in-mauritius>

²⁰⁷ According to UN data, the literacy ration of the overall population has been about 92% since 2012. In addition, in the 2000s, the Mauritian government aided and supported the youth who wanted a college education

²⁰⁸ Chan Sun C.A., Dr. Chitto H. & Dr. Sukon KS. (2016), *The Labour Market: A Mismatch in the Clothing and Textile Industry in Mauritius*, available at: <https://globaljournals.org/item/6252-the-labour-market-a-mismatch-in-the-clothing-and-textile-industry-in-mauritius>

The textile sector in Madagascar is subject to some of the same pressures, even if the clothing industry is expanding in the last few years.²⁰⁹ A producer of cotton, Madagascar exports about 90% of its cotton fibre production, mostly because of a lack of processing infrastructures (it has only one spinning and three industrial weaving factories). Exports of cotton have been declining since 2014, mostly to Mauritius, India and Pakistan, where many clothing companies have moved their production, probably also as a consequence of the political instability of the years 2009-2014.²¹⁰ The low wages (lower than other African countries competing in the same sector) reduce the competition within the workforce (even if there has been a small but growing presence of Chinese temporary migrant workers)²¹¹.

Producers of **cotton** have started taking part in the Better Cotton Initiative (BCI), 'a private initiative which promotes better standards in cotton farming'. This allows them to receive financial support from the World Bank. Within this initiative, producers and workers have been trained in OSH standards and in developing protection schemes. In 2017, the outreach of these training activities was 30% of producers. 'However, some producers report difficulties in complying with the standards for applying hazardous (crop protection) chemicals owing to increasing insect attacks and the cost of purchasing PPE'. The BCI is a label that is in increased demand and the production of BCI cotton has increased strongly between 2011 and 2017.²¹²

In addition, in the last decade, there have been concerns about labour rights abuses in the textile sector in Madagascar and Mauritius, mostly in reference to textile companies that are located in export processing zones (EPZs).^{213, 214} In general, EPZs are areas within developing countries that offer incentives and a barrier-free environment to promote economic growth by attracting foreign investment for export-oriented production.²¹⁵

In Madagascar, EPZ companies generally respected labour laws, as many foreign partners require good working conditions in compliance with local law before signing contracts with EPZ companies. However, trade unions reported a shift in recent years from paying hourly wages to a piece-rate payment system that worsened conditions for labourers in the textile sector, who are primarily women. The practice, designed to increase productivity, has reportedly led to an increase in work-related accidents and injured women's health. Observers declared many women unfit to occupy these positions by age 40. There were also reports that EPZ companies prioritized setting a production target that was generally difficult to attain and penalized workers with various sanctions, such as unpaid overtime, disciplinary action, or even dismissal.²¹⁶ The ILO CEACR has also raised allegations of labour rights violations in EPZs, such as waiver of the application of provisions of the labour code concerning night work and the precarious nature of working conditions (including lack of employment contracts, holiday entitlements, social protection or collective agreements, and failures to pay the minimum wage).²¹⁷

²⁰⁹ ILO, 2020, *Drivers and constraints for occupational safety and health improvement in the global textile supply chain from Madagascar*, 2020

²¹⁰ ILO, 2020, *Drivers and constraints for occupational safety and health improvement in the global textile supply chain from Madagascar*, 2020

²¹¹ Tremann C. (2013), *Temporary Chinese Migration to Madagascar: Local Perceptions, Economic Impacts, and Human Capital Flows*, *African Review of Economics and Finance*, 5 (1), December 2013

²¹² ILO, 2020, *Drivers and constraints for occupational safety and health improvement in the global textile supply chain from Madagascar*, 2020.

²¹³ Cling, J. P., Razafindrakoto, M., & Roubaud, F. (2005). *Export processing zones in Madagascar: a success story under threat?*. *World development*, 33(5), 785-803.

²¹⁴ In general, EPZs are areas within developing countries that offer incentives and a barrier-free environment to promote economic growth by attracting foreign investment for export-oriented production. See: Papadopoulos, N., & Malhotra, S. (2007). *Export Processing Zones in Development and International Marketing: An Integrative Review and Research Agenda*. *Journal of Macromarketing*, 27(2), 148–161.

²¹⁵ Papadopoulos, N., & Malhotra, S. (2007). *Export Processing Zones in Development and International Marketing: An Integrative Review and Research Agenda*. *Journal of Macromarketing*, 27(2), 148–161.

²¹⁶ US Department of State, 'Madagascar 2018 Human Rights Report' (2019).

²¹⁷ CEACR, 'Direct Request. Discrimination (Employment and Occupation) Convention, 1958 (No. 111) - Madagascar (Ratification: 1961)', adopted 2019, published 109th ILC session (2021).

In Mauritius, despite efforts from the government to ensure respect for labour rights, trade unions have reported cases of forced overtime and underpayment for overtime in the textile and apparel industries due to differences in existing legislation and remuneration orders for the calculation of overtime hours. There have also been allegations that employers do not always comply with safety regulations, resulting in occupational accidents. There have been reports of foreign workers living in dormitories with unsanitary conditions, which gave rise to spontaneous protests during the year.²¹⁸ The ILO CEACR has also raised allegations of labour rights abuses in the textile sector and EPZs, including anti-union discrimination and obstacles for workers, especially migrant workers, to join trade unions, and low use of collective bargaining.²¹⁹

There has been one instance where labour rights abuses could be linked to European apparel companies following an analysis of business partners involved in the supply chain. In 2019, the Business and Human Rights Resource Centre (BHRRC) reported that the closure of a garment factory in Mauritius had left workers, including migrant workers, without jobs and the payment of two months' wages. Migrant workers were particularly affected as they did not have access to food and adequate shelter. The BHRRC identified two European companies as brands sourcing from the Mauritius factory.²²⁰ However, it is unclear whether more European companies are linked to labour rights abuses in the textile sector in Madagascar and Mauritius, and whether textile imported to the EU from those countries generally involves labour rights abuses.

While these seem to be episodic rather than systemic issues, and not directly related to the interim EPA, closer monitoring and possibly enforcement of labour rights could be taken into account in future negotiations.

Fisheries

Processing of fisheries products are major export items towards the EU for both Mauritius and even more, for Seychelles, which exports about 98% of processed fisheries (mostly canned tuna) to the EU.

Trade of processed fisheries products in Seychelles

The trade of processed food (mostly canned tuna) in Seychelles has seen a decline in both value and volume over the last years. Data on the level of employment and salaries in the sector are scarce and do not allow for an in-depth analysis. Available literature links such decline to depletion of fish stocks, due both to fishing from local boats (for local consumption, semi-industrial and industrial fishing) as well as ships from the EU and other countries, such as Japan and China.²²¹ While the decreasing economic trend (which lasted for the period 2013-2015) seems to be re-absorbed also in terms of employment (back to the 2014 levels), this 'crisis' has produced a deep impact on Seychelles. The government has thus launched an ambitious marine conservation strategy, supported by the World Bank as the SWIOfish3 project.²²² The strategy balances the preservation of national marine protected areas and resources with greater and stronger management of fisheries at the national level and the support to the development of the blue economy, founded on marine resources.

²¹⁸ US Department of State, 'Mauritius 2018 Human Rights Report' (2019); US Department of State, 'Mauritius 2019 Human Rights Report' (2020).

²¹⁹ CEACR, 'Observation. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) - Mauritius (Ratification: 2005)', adopted 2017, published 107th ILC session (2018); CEACR, 'Observation. Right to Organise and Collective Bargaining Convention, 1949 (No. 98) - Mauritius (Ratification: 1969)', adopted 2017, published 107th ILC session (2018).

²²⁰ BHRRC, 'Mauritius: Closure of garment factory supplying to ASOS & John Lewis leaves migrant Bangladeshi workers unpaid & stranded; ASOS outlines remediation efforts' (14 August 2019, available at <https://www.business-humanrights.org/en/latest-news/mauritius-closure-of-garment-factory-supplying-to-asos-john-lewis-leaves-migrant-bangladeshi-workers-unpaid-stranded-asos-outlines-remediation-efforts/>)

²²¹ Breuil, C.; Grima, D. (2014), *Fisheries in the ESA-IO Region: Profile and Trends – Country Review: Seychelles*, FAO, available at: <http://www.fao.org/publications/card/en/c/45008da5-a394-4544-af94-e9ae4b04860f/>

²²² See: https://ewdata.rightsindevelopment.org/files/documents/42/WB-P155642_vUnwDBU.pdf

While the interim EPA addresses fisheries, the EU's cooperation in this sector is also carried out via the Sustainable Fisheries Partnership Agreements (SFPAs).

Trade of marine aquaculture production in Madagascar

Madagascar exports the majority of its marine aquaculture production to Europe: this includes 70% of its shrimp and prawn exports (France, Spain and Italy are the main importing countries). Most of the remaining exports go to Japan.²²³ The processing of fisheries products has seen a decline in Madagascar compared to the 2011-2012 period, and so have salaries of those employed in the sector. While the data available show an improvement in the situation in the following years, it is not possible to ascertain whether the industry has recovered entirely and reached the earlier levels (the last data available was for 2015). There are reports of depletion of marine resources due to overfishing and the presence of boats from the EU and other countries, which seem to have impacted mostly local fishers.²²⁴

It is possible that the duty- and quota-free access to the EU market have increased the demand for fisheries and processed fisheries products from Madagascar and Seychelles, even if there is no evidence of such a direct link. Nevertheless, easier access to the EU market and increased pressure from EU and third countries boat using the same waters might have stressed excessively the marine resources of the countries, leading to depletion. Corrective measures have been taken, but it might be considered to pay more attention to such problems in the next negotiations.

Right to food and trade of processed fisheries products in Comoros and Madagascar

A number of the interim EPA's provisions on fisheries can have an indirect impact on several human rights, including the right to an adequate standard of living, and the right to food, in particular, fundamental labour rights, freedom of association, freedom from discrimination, and equality between women and men.

In the interim EPA, the Parties recognise **that fisheries constitute a key economic resource of the ESA region** and are an **important source of food and foreign exchange**.²²⁵ They agree to **cooperate for the sustainable development of the fisheries sector** in their mutual interests taking into account the economic environmental and social impacts.²²⁶ In particular, cooperation in fisheries must respect the principle of preservation and priority of particular needs of artisanal/subsistence fishery.²²⁷ Furthermore, cooperation in fisheries must ensure a more equitable share of the benefit derived from the fisheries sector²²⁸ and must apply a precautionary approach to fisheries management and conservation issues to avoid undesirable impacts on ecosystems and artisanal fisheries.²²⁹ Where the EU has negotiated bilateral fisheries agreements, the employment of ESA nationals must be encouraged. The ILO Declaration on fundamental principles and rights at work must apply as of right to seamen signed on EU vessels.²³⁰ In the sector of inland fisheries and aquaculture, the EU must contribute to the capacity building and export market development through increasing capacity in the region through improving competent authorities, traders' associations and fishermen's associations to participate in fisheries trade with the EU and training programs in product development.²³¹ It shall also contribute to socio-economic and poverty alleviation measures encouraging participation of marginal groups in the fishing industry, through the promotion of gender equality in fisheries by

²²³ See: http://www.fao.org/fishery/countrysector/naso_madagascar/en

²²⁴ See : <https://news.mongabay.com/2019/10/madagascar-opaque-foreign-fisheries-deals-leave-empty-nets-at-home/>

²²⁵ interim EPA, Article 25(1).

²²⁶ interim EPA, Article 25(2).

²²⁷ interim EPA, Article 28(1)(g).

²²⁸ interim EPA, Article 31(b).

²²⁹ interim EPA, Article 32(2)(a)(1).

²³⁰ interim EPA, Article 32(2)(b)(2).

²³¹ interim EPA, Article 35(1)(a)(iii).

developing the capacity of women engaged in fisheries and other disadvantaged groups with the potential to engage in fisheries for sustainable social-economic development.²³²

Subsistence fisheries are important in Comoros, Madagascar, Mauritius, and Seychelles. In those countries, fisheries contribute to food security and the livelihood of local fishing communities. In Madagascar, in 2011, fishing accounted for almost 20% of animal protein consumption and employed more than 100,000 fishermen (the number of women and children contributing to fishing must be added to this number). Traditional subsistence fishing is a survival strategy for an increasing number of Malagasy people.²³³

A number of **social and human rights issues exist in the context of fisheries.**

In **Madagascar**, subsistence fishing coexists with an industrial fishery dominated by foreign fleets of modern boats, except for the shrimp fishing sector. Madagascar has signed fisheries agreements with the EU and a number of Asian countries. In 2011, the UN Special Rapporteur on the right to food reported concerns that fishing by industrial fishing fleets, mainly foreign ones, would have a negative impact on the coastal families and communities that depend on small-scale fishing for their livelihoods. In particular, Madagascar's fisheries agreements did not provide sufficient guarantees for the sustainable exploitation of marine resources and fair financial compensation to Madagascar.²³⁴ Those concerns have persisted in recent years. There have been reports that the depletion of fishing stocks has an impact on small fishermen who find it hard to have access to fish. A number of stakeholders, including Malagasy fishermen, NGOs and international organisations such as the WTO, have been critical of the social and human rights impacts of Madagascar's fisheries agreements.²³⁵ In its 2015 Trade Policy Review of Madagascar, the WTO stated that deep-sea fishing in Madagascar's waters took place under trading conditions favourable to foreign companies (given that there were no maximum catch limits) and that there was a need for reforms in order to achieve sustainable management of resources while maximizing income from fisheries.²³⁶

The interim EPA provides that one objective of cooperation in marine fisheries is to ensure a more equitable share of the benefits derived from the fisheries sector. However, compensation for fish quotas is usually negotiated in the context of bilateral fisheries agreements, which are independent of the interim EPA. Furthermore, a review of development cooperation programmes showed that no specific initiative had sought to realise the objective of a more equitable share of benefits derived from the marine fisheries sector. Therefore, no potential positive impacts on human rights could be established based on this provision of the interim EPA.

Interim EPA's impact on government spending in relevant sectors

A number of stakeholders have generally been concerned about the potential human rights impacts of EPAs between ACP countries and the EU.²³⁷ In 2008, the UN Special Rapporteur on the Right to Food stated that further trade liberalisation could have a potential negative impact on farmers in ACP countries, most notably by creating unfair competition with highly subsidised EU production and leaving farmers in ACP countries out of work in the agricultural sector. Furthermore, he suggested that the elimination of tariffs on EU imports could result in a substantial loss of revenue for ACP governments. There was a risk that lower tax revenue could

²³² *interim EPA, Article 35(1)(f)(ii).*

²³³ *UN Special Rapporteur on the Right to Food, 'Mission to Madagascar' (26 December 2011) UN Doc A/HRC/19/59/Add.4.*

²³⁴ *UN Special Rapporteur on the Right to Food, 'Mission to Madagascar' (26 December 2011) UN Doc A/HRC/19/59/Add.4.*

²³⁵ *Coalition for Fair Fisheries Arrangements, 'Briefing: Financial compensation, support for development and transparency, the key issues at stake in the negotiation of the EU-Madagascar SFPA' (21 April 2020); Cécile Fattebert, 'La pêche traditionnelle ou petite pêche maritime à Madagascar: un état des lieux' (CAPE, April 2020); WTO, 'Trade Policy Review. Report by the Secretariat. Madagascar' (9 June 2015) WT/TPR/S/318.*

²³⁶ *WTO, 'Trade Policy Review. Report by the Secretariat. Madagascar' (9 June 2015) WT/TPR/S/318.*

²³⁷ *Oxfam, 'Unequal Partners: How EU-ACP Economic Partnership Agreements could harm the development prospects of many of the world's poorest countries', (September 2006).*

force ACP countries to cut fiscal expenditure, therefore jeopardising the social programmes necessary to the realisation of economic, social and cultural rights, including the right to food.²³⁸

We assessed whether the elimination of tariffs on imports from the EU could result in substantial loss of revenue for ESA governments and jeopardise public expenditure in areas relevant to the achievement of economic, social, and cultural rights, such as the right to education and the right to health. However, there was no evidence pointing to this conclusion.

Except for Zimbabwe, there has been no decrease in government spending on education amongst the ESA countries since the entry into force of the interim EPA. Madagascar spent 2.3% of its GDP on education in 2012 and 2.8% of its GDP in 2018. In Mauritius, government expenditure on education accounted for 3.4% of GDP in 2012 and 4.7 of GDP in 2019. Seychelles spent 2.6% of its GDP on education in 2012 and 4.4% in 2016. In Zimbabwe, however, while government education spending accounted for 6.07% of GDP in 2012, it decreased to 5.8% in 2018. There was no data available for Comoros for 2019.²³⁹

Similarly, there has been no decline in current health expenditure amongst most ESA countries since the entry into force of the interim EPA. Madagascar spent 4.41% of GDP on current health in 2012 and 5.5% of GDP in 2017. In Mauritius, current health expenditure represented 4.2% of GDP and 5.7% of GDP in 2017. In Zimbabwe, current health expenditure went from 6.48% of GDP in 2012 to 6.6% of GDP in 2017. However, Seychelles saw a 0.7% decline in health spending. Although current health expenditure accounted for 5.7% of GDP in 2012, it decreased to 5% in 2017. There was no data available for Comoros for 2019.²⁴⁰

Pursuant to Article 11 of the interim EPA, customs duties on imports of products originating in the EU must be reduced or eliminated in accordance with specific schedules of tariff liberalisation. However, an overview of import tariffs on EU goods reveals that there are still high import tariffs in place in most ESA countries. Comoros has high import tariffs on goods from the EU, except for agri-food products. However, there is a need for low import tariffs on agri-food products, as Comoros relies on imported food to ensure food security. In general, Madagascar's import tariffs are relatively high for agricultural commodities, food and beverages, but they are relatively low for manufactured products. Mauritius has also high import tariffs on goods imported from the EU, especially beverages and tobacco products. However, those tariffs are low compared to other ESA countries (except Seychelles). Seychelles has relatively low import tariffs, which have remained relatively stable since 2015. Zimbabwe's import tariffs on goods from the EU are very high, in particular for agricultural commodities, beverages, tobacco products, and manufactured products. They decreased only marginally from 2010 to 2016.

In the absence of detailed data on customs duties on imports of products originating in the EU imported by ESA5 countries and their evolution over time, the analysis used the Fraser Institute Economic Freedom of the World Index measures as a proxy for trade liberalisation.²⁴¹ In particular, the analysis used data on the component n. 4 of the index, namely: Freedom to trade internationally, and more, in detail on the revenues from trade taxes (component 4.1 - tariffs), and assessed them in relation to the trends on GDP growth in the ESA countries, to understand whether trade liberalisation (as measured by the Index component) was related to economic growth in the period, and whether or not it supported the realisation of the access to food among the population.

²³⁸ UN Special Rapporteur on the right to food, 'Report of the Special Rapporteur on the right to food, Jean Ziegler' (10 January 2008) UN Doc A/HRC/7/5.

²³⁹ World Bank, 'Government expenditure on education, total (% of GDP) - Comoros, Madagascar, Mauritius, Seychelles, Zimbabwe', available at <https://data.worldbank.org/indicator/SE.XPD.TOTL.GD.ZS?end=2019&locations=KM-MG-MU-SC-ZW&start=2010&view=chart>

²⁴⁰ World Bank, 'Current health expenditure (% of GDP) - Comoros, Madagascar, Mauritius, Seychelles, Zimbabwe', available at <https://data.worldbank.org/indicator/SH.XPD.CHEX.GD.ZS?end=2017&locations=KM-MG-MU-SC-ZW&start=2010>

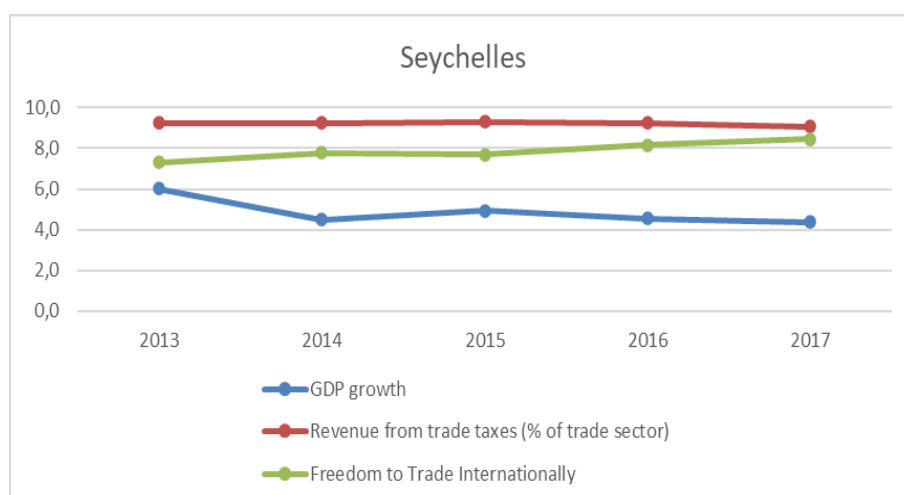
²⁴¹ The Index measures degree to which the institutions and policies of countries are consistent with economic freedom. The latest report is available at: <https://www.fraserinstitute.org/studies/economic-freedom-of-the-world-2020-annual-report>

The analysis was possible for the whole 2010-2019 period for Madagascar and Mauritius, for which it exists a time series of Economic Freedom Index (Comoros is only included provisionally in the last report, and data for Seychelles start in 2013). The analysis did not include Zimbabwe, as the coup d'état and the related high political instability influenced economic growth much more than any other policy measure and/or trade agreement.

The analysis showed that the two countries that have lower tariffs and non-trade barriers, i.e. Madagascar and Mauritius, have experienced a more stable and continuous economic growth, even if the growth rate has not been particularly high (see Figure 32 below). Data for Seychelles showed a similar trend (albeit the time series is shorter), and a slight decline of growth in recent years, even if revenues from tariffs have been essentially stable and non-tariff barriers have decreased. This likely depends on other factors (for instance, a decrease in tourism and/or fisheries activities – which are the main industries of the country).

Figure 32: GDP growth, revenue from trade and freedom to trade in selected ESA countries





Source: elaboration for Fraser Institute Economic Freedom of the World Index and World Bank data

Furthermore, inflation in these countries remained below 10% over the entire period, which means no hyper-inflation or large loss of consumers' purchasing power, which is also expected to contribute to support access to food. Other data on government consumption and transfers and subsidies also show that governments have slightly increased their consumption to implement support and social security programmes for the population. For instance, Mauritius has started a more inclusive pension scheme, which supports citizens (and consumers). Overall, it seems that liberalisation of trade (and consequent reduction of revenues from trade tariffs) has been compensated by other government revenues, as showed by World Bank data.²⁴²

While it is not possible to affirm that trade liberalisation did not negatively impact the right to food in the ESA countries, it is not possible to relate such effects to the interim EPA.

Context and overview for the assessment of environmental impacts

This Annex describes the environmental issues in the ESA5 countries. It provides an overview of the environmental context in the last 10 years (i.e., from 2010 to 2019), and thus provides indications of the evolution during the period of the interim EPA's implementation. It is based on UN and international sources where possible to provide the basis for a common baseline; these are complemented by national sources from the ESA5 countries.

Context: environmental issues in the ESA countries

Overview and key indicators

The Table below provides an overview of key environmental indicators for the five ESA countries. Data are provided for 2019 or the latest available year.

²⁴² See: <https://data.worldbank.org/indicator/GC.TAX.GSRV.CN?locations=MU>

Table 100: Key environmental indicators for the ESA countries

	Comoros	Madagascar	Mauritius	Seychelles	Zimbabwe
Surface area (km ²) 2019 ²⁴³	2,235	587,295	1,969	457	390,757
Population density (per km ²) 2019 ²⁴⁴	457.2	46.4	625.5	212.5	37.9
Environmental Performance: Yale EPI score 2020 ²⁴⁵	32.1	26.5	45.1	58.2	37
Yale EPI rank ²⁴⁶	148	174	82	38	123
CO2 emissions (tons per capita) 2019 ²⁴⁷	0.2	0.1	3.3	5.2	0.8
Adaptation to climate change: ND-GAIN score 2017 ²⁴⁸	39.2	32.9	55.6	48.4	33.1
ND-GAIN rank ²⁴⁹	137	169	50	91	168
Forested area (% of land area) 2019 ²⁵⁰	19.7	21.4	19	88.4	35.5
Terrestrial protected areas (% of total land area) 2018 ²⁵¹	10.2	5.6	4.7	42.1	27.2
Number of threatened species (2019) ²⁵²	121	1929	263	443	103

Notes: see footnotes for sources. Please note that UN data on marine protected areas do not match information found in UN and other documents used in the descriptions below. This data will be reviewed in the course of the study.

Emissions of carbon dioxide from fossil fuel combustion have increased in Madagascar and Mauritius since 2012 but have fallen in Seychelles and Zimbabwe (in Seychelles, emissions have risen since 2013 following a drastic fall from 2012 to 2013): see Figure 33, 34 and Table 101 below.

²⁴³ UN data: <http://data.un.org/>

²⁴⁴ UN data: <http://data.un.org/>

²⁴⁵ The Environmental Performance Index (EPI) provides a quantified summary of the environmental performance of countries around the world. It uses 32 performance indicators across 11 issue categories. The EPI uses a score of 0 to 100 (the maximum value). 2020 EPI Results: <https://epi.envirocenter.yale.edu/epi-topline>

²⁴⁶ 2020 EPI Results: <https://epi.envirocenter.yale.edu/epi-topline>

²⁴⁷ UN data: <http://data.un.org/>

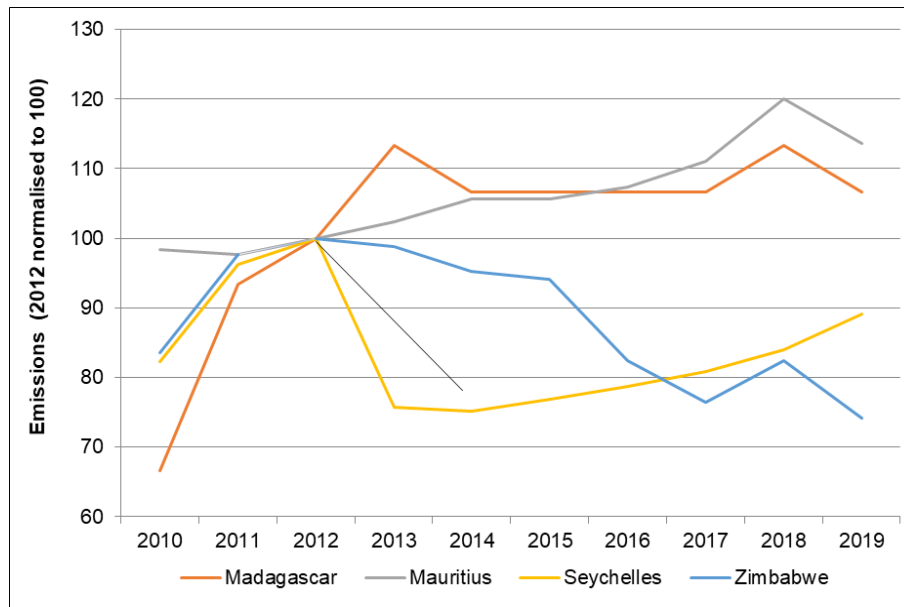
²⁴⁸ The Notre Dame Global Adaptation Initiative (ND-GAIN) score is an index assessing a country's vulnerability to climate change and its resilience and readiness vis-à-vis climate impacts. Overall, 45 indicators contribute to developing the country index, with 36 indicators assessing vulnerability and 9 assessing readiness. Scores range from 0 to 100 to rank more than 180 countries. Notre Dame Global Adaptation Initiative: <https://gain.nd.edu/our-work/country-index/rankings/>

²⁴⁹ Notre Dame Global Adaptation Initiative : <https://gain.nd.edu/our-work/country-index/rankings/>

²⁵⁰ UN data: <http://data.un.org/>

²⁵¹ UNSD Environmental Indicators, Land and Agriculture, Terrestrial protected areas: <https://unstats.un.org/unsd/envstats/qindicators>
Terrestrial protected areas are defined as totally or partially protected areas of at least 1,000 hectares that are designated by national authorities as scientific reserves with limited public access, national parks, natural monuments, nature reserves or wildlife sanctuaries, protected landscapes, and areas managed mainly for sustainable use.

²⁵² UN data: <http://data.un.org/>

Figure 33: Trends in CO₂ emissions per capita from fossil fuel combustion (2010 to 2019)

Source: Knoema, based on JRC EDGAR²⁵³

Table 101: CO₂ emissions (metric tons per capita) from fossil fuel combustion, 2012 and 2018 levels

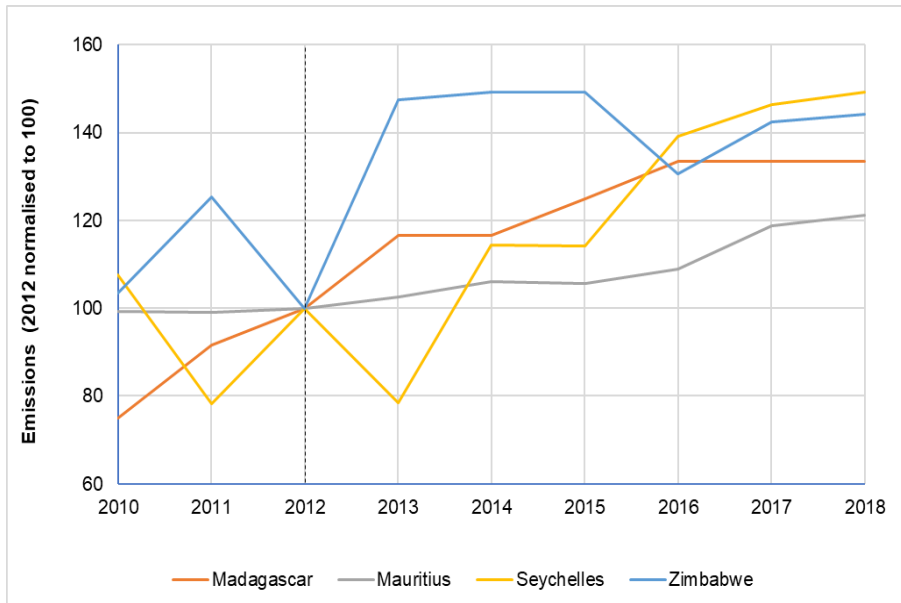
	Madagascar	Mauritius	Seychelles	Zimbabwe
2012	0.15	3	12	0.85
2019	0.16	3.41	10.98	0.63

Source: Knoema, based on JRC EDGAR²⁵⁴

When factoring in other sources of carbon emissions, such as land use change, it appears that emissions have risen in all four countries. Please note that the figures are based on different data sources and are not directly comparable.

²⁵³ Knoema, CO₂ emissions per capita: <https://knoema.com/atlas/Zimbabwe/CO2-emissions-per-capita>, based on JRC EDGAR emissions inventory and modelling: <https://edgar.jrc.ec.europa.eu/overview.php?v=booklet2020&dst=CO2pc>

²⁵⁴ Knoema, CO₂ emissions per capita: <https://knoema.com/atlas/Zimbabwe/CO2-emissions-per-capita>, based on JRC EDGAR emissions inventory and modelling: <https://edgar.jrc.ec.europa.eu/overview.php?v=booklet2020&dst=CO2pc>

Figure 34: Trends in CO₂ emissions per capita from fossil fuel combustion (2010 to 2019)

Source: Global Carbon Project²⁵⁵

Ratification of multilateral environmental agreements (MEAs)

The table below provides an overview of the ratification of key MEAs by the five ESA countries.

²⁵⁵ Global Carbon Project, <http://www.globalcarbonatlas.org/en/CO2-emissions>

Table 102: Ratification (or accession) of key international conventions on environment, including oceans and climate change

	Comoros	Madagascar	Mauritius	Seychelles	Zimbabwe
Biodiversity					
Convention on International Trade in Endangered Species of Wild Fauna and Flora (1973)	21/02/1995	18/11/1975	27/07/1975	09/05/1977	17/08/1981
Lusaka Agreement on Co-operative Enforcement Operations Directed at Illegal Trade in Wild Fauna and Flora (1994)	/	/	/	/	/
Convention on Biological Diversity (1992)	29/09/1994	04/03/1996	04/09/1992	22/09/1992	11/11/1994
Cartagena Protocol on Biosafety (2000)	25/03/2009	24/11/2003	11/04/2002	13/05/2004	25/02/2005
Nagoya Protocol on Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their Utilization (ABS) to the Convention on Biological Diversity (2010)	28/05/2013	03/07/2014	17/12/2012	20/04/2012	01/09/2017
Desertification					
UN Convention on Desertification (1994)	03/03/1998	25/06/1997	23/01/1996	26/06/1997	23/09/1997
Oceans and Fisheries					
International Convention for the Prevention of Pollution from Ships (MARPOL) (1973)	22/02/2001	30/11/2005	06/07/1995	28/02/1991	/
Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter (1972)	/	/	/	28/11/1984	/
International Convention on Oil Pollution Preparedness, Response and Co-operation (1990)	05/04/2000	20/08/2002	02/03/1999	13/05/1995	/
United Nations Convention on the Law of the Sea (1982)	21/06/1994	22/08/2001	04/11/1994	16/09/1991	24/02/1993
Agreement for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea of 10 December 1982 relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks (1995)	/	/	25/03/1997	20/03/1998	/
FAO Agreement to Promote Compliance with International Conservation and Management Measures by Fishing Vessels on the High Seas (1993)	/	26/10/1994 (acceptance)	27/03/2003 (acceptance)	07/04/2000 (acceptance)	/

	Comoros	Madagascar	Mauritius	Seychelles	Zimbabwe
Agreement for the Establishment of the Indian Ocean Tuna Commission (1993)	14/08/2001	10/01/1996	27/12/1994	26/07/1995	/
Southern Indian Ocean Fisheries Agreement (2006)	Sign. only 07/07/2006	Sign. only 04/10/2006	10/12/2010	05/11/2007	/
FAO Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated (IUU) fishing (2009)	/	27/03/2017 (accession)	31/08/2015 (accession)	19/06/2013 (accession)	/
The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships (2009)	/	/	/	/	/
Waste and chemicals					
Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (1989)	31/10/1994	02/06/1999	24/11/1992	11/05/1993	01/03/2012
Amendment to the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal [Ban amendments] (1995)	/	/	09/11/2004	15/07/2015	/
Basel Protocol on Liability and Compensation for Damage resulting from Transboundary Movements of Hazardous Wastes and their Disposal (1999)	/	/	/	/	/
Amendments to Annexes II, VIII and IX to the Basel Convention [Plastic waste amendments] (2019)	24/03/2020	24/03/2020	24/03/2020	24/03/2020	24/03/2020
Bamako Convention on the Ban on the Import into Africa and the Control of Transboundary Movement and Management of Hazardous Wastes within Africa (1991)	18/03/2004	Sign. only (17/03/2004)	29/10/1992	/	10/07/1992
Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade (1998)	/	22/09/2004	05/08/2005	Sign. only (11/09/1998)	01/03/2012
Stockholm Convention on Persistent Organic Pollutants (2001)	23/02/2007	18/11/2005	13/07/2004	03/06/2008	01/03/2012
Minamata Convention on Mercury (2013)	23/07/2019	13/05/2015	21/09/2017	13/01/2015	29/12/2020
Water					

	Comoros	Madagascar	Mauritius	Seychelles	Zimbabwe
Convention on the Law of the Non-navigational Uses of International Watercourses (1997)	n.a.	n.a.	n.a.	n.a.	/
Climate change and ozone layer					
Vienna Convention for the Protection of the Ozone Layer (1985)	31/10/1994	07/11/1996	18/08/1992	06/01/1993	03/11/1992
Montreal Protocol on Substances that Deplete the Ozone Layer (1987)	31/10/1994	07/09/1996	18/08/1992	06/01/1993	03/11/1992
The United Nations Framework Convention on Climate Change (1992)	31/10/1994	02/06/1999	04/09/1992	22/09/1992	03/11/1992
Kyoto Protocol to the United Nations	10/04/2008	24/09/2003	09/05/2001	22/07/2002	30/06/2009
Paris Agreement on Climate Change (2015)	23/11/2016	21/09/2016	22/04/2016	29/04/2016	07/08/2017

Sources:

- International Maritime Organisation, 2020, GISIS database: <https://gis.imo.org>
- United Nations, 2020, ratification database: <https://treaties.un.org/Pages/ParticipationStatus.aspx?clang=en>.

Notes:

/ neither ratified nor signed
n.a. not applicable
Sign. only signature only (not ratified)

Comoros, Madagascar, Mauritius and Seychelles are also members of the Southwest Indian Ocean Fisheries Commission (SWIOFC), which “promotes the application of the provisions of the FAO Code of Conduct on Responsible Fisheries, including the precautionary approach and the ecosystem approach to fisheries management”²⁵⁶. This Commission was established by Resolution 1/127 of the FAO Council, following a request in June 1999 by the former members of the Committee for the Development and Management of Fisheries Resources in the South-West Indian Ocean. Comoros, Madagascar, Mauritius and Seychelles were all part of that Committee.

FAO’s initiative on the Global Record of Fishing Vessels, Refrigerated Transport Vessels and Supply Vessels is a tool to address illegal, unreported and unregulated fishing (IUU) initiative²⁵⁷. The first Record was released in April 2017 following a pilot project involving 11 countries including Comoros, Mauritius and Seychelles (launched in December 2016). Seychelles is the only ESA country to have provided data regarding vessel details and ports²⁵⁸

²⁵⁶ FAO (2019) ‘Regional Fishery Bodies Summary Descriptions: Southwest Indian Ocean Fisheries Commission (SWIOFC)’, available at: <http://www.fao.org/fishery/rfb/swiofc/en>

²⁵⁷ Committee on Fisheries (2018) ‘Combating illegal, unreported and unregulated (IUU) fishing’, available at: <http://www.fao.org/3/MX190EN/mx190en.pdf>

²⁵⁸ FAO, ‘Global Record of Fishing Vessels, Refrigerated Transport Vessels and Supply Vessels’: <http://www.fao.org/global-record/tool/extended-search/en/>

*Evidence of the environmental impacts of the interim EPA***Changes in trade flows**

This section looks at the changes in trade flows that have occurred since the entry into force of the interim EPA. It then looks at the environmental impacts associated with the production of the most important commodities for each country, to provide some context for potential environmental impacts of the interim EPA.

In **Madagascar**, the importance of **vanilla** in exports to the EU has increased considerably since the introduction of the interim EPA. While there has been a strong increase in the value of exports to the EU, the volumes in tons have not changed as strongly. Nonetheless, the increased vanilla prices can create pressures for increased cultivation. This is a perennial crop and therefore can be associated with change of land use as space is needed for the crops. Change in land use can be a driver of deforestation, which has a concomitant effect on biodiversity loss.

Exports of **cobalt** and **nickel** appear to have grown significantly since the interim EPA was introduced. Mining of these materials is associated with the production of hazardous waste and difficulties in wastewater management. **Textiles** are also a major export for Madagascar, although this appears to remain unchanged by the interim EPA. Equally, fishing of **crustaceans** has continued to be an important export activity in Madagascar towards the EU. Export of **essential oils** appears to have increased over the period of the interim EPA; this may in part be because the processing of plants to extract the essential oils now occurs more frequently in Madagascar, whereas previously plants were exported as raw materials to a greater extent²⁵⁹.

The most important export from **Mauritius** to the EU in 2019 was **processed fish**, which has consistently been amongst the most valuable export sectors for Mauritius over the last ten years nearly all of Mauritius' export of processed fish goes to the EU. **Sugar** has traditionally been the principal export of Mauritius; despite the price drop incurred following the end of the fixed sugar prices and quota of the sugar protocol, sugar remains a major export to the EU. **Textiles** have also continued to be an important sector.

By far the biggest export commodity in terms of value for **Seychelles** continues to be **processed fish**, which has remained unchanged over the previous decade. Whilst the value has decreased since 2012, the tonnage has remained stable since 2013. Other important commodities exported from Seychelles to the EU are **yachts** and **frozen fish**.

Zimbabwe's largest value export to the EU in 2019 was **diamonds**. It appears that the importance of diamonds as an export commodity has risen over the period of the interim EPA. Mining can be associated with the production of hazardous waste materials and potential pollution of water and land, as well as change in land use. **Cut flowers** have long had a significant share of Zimbabwe's export to the EU and are produced as both annual and perennial crops.

Country-by-country information on the impacts of these economic activities has not been found. The table below, however, provides an overview of the main environmental impacts associated with each of the main export industries.

²⁵⁹ Consulate General of Madagascar South Africa, 'Essential oils', <http://www.madagascarconsulate.org.za/madagascar/economy/essential-oils/>

Table 103: Environmental impacts associated with important export industries in ESA5 countries (source: International Finance Corporation Environmental, Health and Safety Guidelines)²⁶⁰

Industry	Environmental impact	Countries affected
Mining	<ul style="list-style-type: none"> Hazardous materials and waste Waste water Emissions to air Energy consumption Solid and liquid waste 	<ul style="list-style-type: none"> Madagascar (cobalt, nickel) Zimbabwe (diamonds)
Textiles	<ul style="list-style-type: none"> Hazardous materials and waste Waste water Emissions to air Energy consumption Solid and liquid waste 	<ul style="list-style-type: none"> Madagascar Mauritius
Sugar	<ul style="list-style-type: none"> Solid waste and by-products Waste water Emissions to air 	<ul style="list-style-type: none"> Mauritius
Fish processing	<ul style="list-style-type: none"> Solid waste and by-products Wastewater Water consumption and management Emissions to air and energy consumption 	<ul style="list-style-type: none"> Madagascar Mauritius Seychelles
Aquaculture	<ul style="list-style-type: none"> Threats to biodiversity Contamination of aquatic systems Hazardous Materials 	<ul style="list-style-type: none"> Madagascar (crustaceans) Mauritius Seychelles
Annual crop production	<ul style="list-style-type: none"> Soil Conservation and Management Nutrient Management Crop Residue and Solid Waste Management Water Management Pest Management Use and Management of Pesticides Fertilizers Biodiversity and Ecosystems Genetically Modified Crops (GM Crops) Energy Use Air Quality Greenhouse Gas (GHG) Emissions 	<ul style="list-style-type: none"> Zimbabwe (cut flowers)
Perennial crop production	<ul style="list-style-type: none"> Soil Conservation and Management Nutrient Management Crop Residue and Solid Waste Management Water Management Pest Management Use and Management of Pesticides Fertilizers Biodiversity and Ecosystems Genetically Modified Crops (GM Crops) Energy Use Air Quality Greenhouse Gas (GHG) Emissions 	<ul style="list-style-type: none"> Madagascar (vanilla, crops for essential oils production) Zimbabwe (cut flowers)

²⁶⁰ International Finance Corporation, *Industry sector guidelines: Mining (2007); Textiles Manufacturing (2007); Sugar Manufacturing (2007); Fish processing (2007); Aquaculture (2007); Annual Crop Production (2016); Perennial Crop Production (2016)*, World Bank group, https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines/ehsguidelines

Changes in transportation of imports and exports

Another facet of the environmental impact of changes in trade flows following the introduction of the EPA is to look at changes in modes of transport used for shipping commodities and whether this has changed. An initial observation is that the quantity of goods (in weight) transported by plane has increased in Madagascar, Seychelles and Zimbabwe, but it is only in Zimbabwe where the increase between 2012 and 2019 is significant (+63%). The table below gives full details of the exports by mode of transport in both value of the goods and weight in kilogrammes. The data appear to refer to the final mode of transport into the EU, as they include transport by road and rail from all five ESA countries.

Considered as a percentage of the weight of all goods transported by sea, air, rail or road, which are the four principal modes of transport, the share of goods transported by air has increased in all four countries between 2012 and 2019 (see Figure 35 below).

Figure 35: Air transport of goods (in kg) as a percentage of all exports by sea, air, rail and road, 2012-2019: Source Eurostat

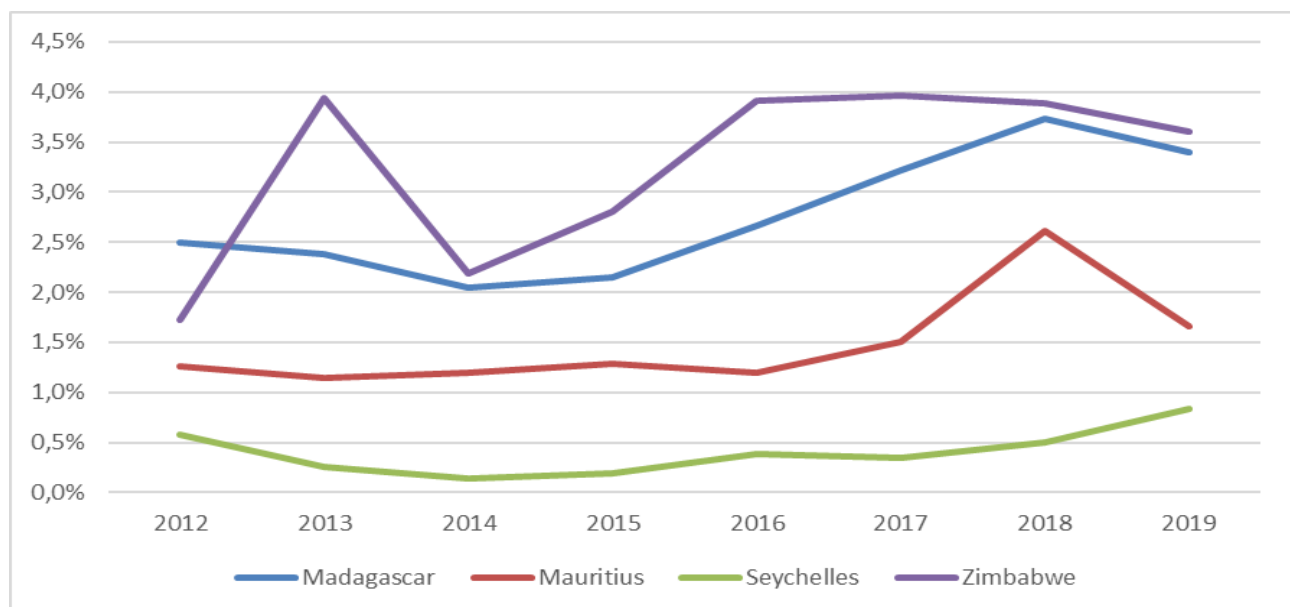


Table 104: Amount of goods shipped by different modes of transport (mode of transport when good arrives in the EU), by value in Euros and quantity in KG.²⁶¹

Madagascar								
	Sea		Air		Rail		Road	
	Value in euros	Quantity in KG	Value in euros	Quantity in KG	Value in euros	Quantity in KG	Value in euros	Quantity in KG
2012	350,851,716	906,779	116,068,080	26,925	311,810	3,290	39,375,121	140,868
2013	471,584,122	1,155,886	146,459,289	31,597	13,849	37	36,650,081	137,554
2014	587,025,800	1,369,496	122,976,696	31,125	223,327	531	40,083,691	119,237
2015	639,274,492	1,297,587	153,576,322	30,999	136,868	340	60,501,668	113,220
2016	610,323,914	1,105,168	258,474,812	31,540	154,516	320	50,701,604	48,490
2017	647,309,306	1,096,956	448,491,932	37,506	1,023	9	49,186,632	29,875
2018	641,526,119	1,042,630	520,757,256	41,311	88,079	256	45,533,517	21,990
2019	545,201,509	1,029,831	422,517,431	37,094	206,782	752	31,767,944	24,048
Mauritius								
	Sea		Air		Rail		Road	
	Value in euros	Quantity in KG	Value in euros	Quantity in KG	Value in euros	Quantity in KG	Value in euros	Quantity in KG
2012	679,506,735	5,303,623	274,006,173	68,736	4,941,222	9,746	37,255,795	98,321
2013	745,747,359	5,916,752	251,604,442	69,302	11,228,689	14,814	27,795,098	62,941
2014	618,074,100	5,651,974	241,128,620	69,173	12,495,338	12,772	30,429,278	63,211
2015	562,587,096	5,176,132	239,093,698	67,929	10,626,397	11,449	32,659,993	52,376
2016	556,913,796	4,995,515	214,905,999	60,862	9,309,602	11,229	29,963,122	31,444
2017	593,037,738	4,369,209	243,233,364	67,491	4,836,297	8,319	29,769,318	25,177
2018	466,142,756	2,606,684	231,339,434	71,008	4,461,779	11,725	23,507,081	31,697

²⁶¹ Eurostat (2020), EXTRA EU trade since 2000 by mode of transport (HS2-HS4)

2019	490,534,613	3,625,573	200,977,833	61,470	589,430	8,393	21,147,739	21,383
Seychelles								
	Sea		Air		Rail		Road	
	Value in euros	Quantity in KG	Value in euros	Quantity in KG	Value in euros	Quantity in KG	Value in euros	Quantity in KG
2012	211,294,193	515,431	6,253,382	3,018	:		1,107,614	2,835
2013	287,707,113	610,027	5,062,526	1,600	:		362,239	919
2014	264,488,981	597,949	2,961,846	830	:		197,344	90
2015	241,322,055	604,822	4,765,516	1,196	:		2,040,300	760
2016	264,218,287	883,099	7,264,560	3,491	:		9,843,161	21,239
2017	273,753,789	874,527	5,999,385	3,052	:		8,583,973	15,351
2018	291,898,698	860,702	5,561,023	4,329	14,580	16	3,143,299	6,961
2019	242,993,220	695,020	7,006,912	5,886	:		94,487	115
Zimbabwe								
	Sea		Air		Rail		Road	
	Value in euros	Quantity in KG	Value in euros	Quantity in KG	Value in euros	Quantity in KG	Value in euros	Quantity in KG
2012	330,286,818	3,715,490	57,765,791	66,981	2,111	20	13,888,765	94,616
2013	244,581,165	2,651,140	105,040,276	112,840	:	:	17,026,431	103,758
2014	315,400,032	4,909,186	142,091,341	113,283	:	:	21,058,981	158,386
2015	287,574,967	3,453,353	80,024,137	106,989	1,801,677	49,864	22,946,486	199,953
2016	232,689,818	2,635,000	81,145,548	113,982	26,671	1	20,979,723	159,660
2017	306,134,829	2,582,325	117,395,348	114,439	:	:	27,367,596	192,545
2018	278,818,537	2,719,174	135,215,084	119,479	:	:	34,528,318	233,464
2019	274,071,827	2,711,139	111,751,369	109,285	:	:	32,148,093	216,079

Source: Eurostat

CGE modelling of climate emissions

The CGE modelling undertaken by DG Trade suggests that the interim EPA has had little impact on the carbon dioxide emissions of the signatories to the agreement. The modelling predicted that CO₂ emissions were slightly lower than they would have been with no EPA in Madagascar (-3.34%) and Mauritius (-2.57%). In Zimbabwe, emissions are predicted to have been 0.03% higher with the EPA than if there had not been one. (The changes were not calculated for Comoros, which joined the agreement only in 2019, or for Seychelles.) The CGE modelling found that the change in CO₂ emissions for the EU was essentially zero.

The table presents the change in CO₂ emissions with the EPA, compared to a scenario if there had been no EPA.

Table 105: CGE modelling of CO₂ emissions with the interim EPA

Country	Estimated change in emissions
Madagascar	-3.34%
Mauritius	-2.57%
Zimbabwe	0.03%

Source: Results from Commission CGE model

Evidence from stakeholder inputs

The stakeholder inputs as yet have not commented on the environmental impacts of the interim EPA. This appears to be due, in part, to the low awareness of the agreement, for example on behalf of many stakeholders interviewed in the ESA countries. *[Further details to be included in the next draft if available.]*

Evidence from the review of EU development cooperation

Development cooperation is mentioned within the text of the EPA under Chapter IV on economic and development cooperation. The scope of development cooperation between the signatories to the agreement includes mainstreaming of environmental issues (Chapter IV, Article 38.2(j)).²⁶² Within this, cooperation should cover natural resources and the environment, including water resources and biodiversity, as well as taking into account environmental protection in industrial development, with a particular focus on the following sectors where environmental impacts are likely: mining, energy, agriculture, fisheries. Title IV of Chapter IV deals specifically with development cooperation in the field of natural resources and the environment. The parties agree to cooperate on developing and managing water resources sustainably, as well as the implementation of trade-related environmental policies so as to protect biodiversity and preventing degradation of the environment.

The Development Matrix in Annex IV of the Agreement sets out objectives for key areas for development grouped into six categories. The first three of these, infrastructure development, productive sectors and regional integration, are particularly relevant for the environmental impact of the economic partnership. For each key area, illustrative activities for development cooperation projects are suggested.

Review of development cooperation projects carried out in ESA5 countries with EU financial support has found evidence of potential environmental impacts related to the interim EPA. Most commonly this has been found in the **fisheries** and **agriculture** sectors, with projects helping to develop more sustainable production techniques that are respectful of the environment. Several countries have also engaged in projects supporting

²⁶² *Interim Agreement establishing a framework for an Economic Partnership Agreement between the Eastern and Southern Africa States, on the one part, and the European Community and its Member States, on the other part, 2012/196/EC*

the development of renewable energy in the countries; in the case of Mauritius, this combines with the agricultural sector in the diversification of the sugar cane industry towards the production of ethanol to be used as a renewable energy source.

Specific EPA support projects are run under the 11th European Development Fund Regional Indicative Programme for Eastern Africa, Southern Africa and the Indian Ocean. However, a review of most of these finds little mention of support for environmental objectives mentioned in the EPA. Where there is a reference to environmental objectives it tends to be limited in scope.²⁶³

The following is a brief survey of development cooperation between the EU and each of the ESA5 countries during the period 2012-2020 that has targeted environmental impacts.

One of the EU priorities in its intervention logic for **Comoros** is promoting sustainable use of natural resources, particularly in the fishing sector.

Projects are also being run in the energy sector: a 2017 project set up the first use of solar energy on-grid in Comoros, funded by the ACP-EU energy facility, helping to relieve reliance on diesel²⁶⁴. Other projects help to improve the climate resilience of the country. A program under AMCC+ (*Alliance Mondiale Contre le Changement climatique*) worked to put in place tools for data management and use of information regarding climate change and help mainstream climate resilience into policy decisions.²⁶⁵

The EU contributes to the sustainable development of fisheries in **Madagascar** through the EcoFish project, which builds on the Smartfish project under the previous development framework. Other projects support the development of sustainable development of agriculture. A support project called SANTARA is directly aimed at aiding the implementation of the interim EPA in Madagascar. Amongst other things, the project works with the fishing industry to improve knowledge of phytosanitary precautions.

There has also been a project to support the development of public water facilities and access to clean water.

Significant evidence has been found of projects working towards improving environmental sustainability in **Mauritius**. Several projects were found that focus on the country's important sugar industry. All worked to support the reform of the sugar industry in Mauritius following the changes to their access to the EU market following the end of the sugar protocol. Two were orientated towards improving Mauritius' competitiveness in the sale of sugar, another towards general diversification of the sugar industry and a third towards development facilities to process cane to produce ethanol, to be used as a source of renewable energy.²⁶⁶

The wider agricultural sector has also been the subject of projects aiming to promote Smart Agriculture to improve climate resilience of food systems. Certain projects have directly targeted the protection and promotion of forests: one project aims to increase forest cover in Mauritius to encourage carbon sequestration and climate resilience.²⁶⁷

²⁶³ See, for example, European Commission (2016) Action Document for Zimbabwe EPA Support Project https://ec.europa.eu/international-partnerships/system/files/c_2016_8091_f1_annex_en_4_zimbabwe_epa_support.pdf

²⁶⁴ Alliance for Rural Electrification (2017), SOLAR23 o install first on-grid solar power plants on Mohéli Island, <https://www.ruralelec.org/news-from-are/solar23-install-first-grid-solar-power-plants-moheli-island>

²⁶⁵ AMCC+, Programme d'appui à l'Union des Comores pour le renforcement de la résilience au changement climatique, <https://www.gcca.eu/fr/programmes/programme-dappui-lunion-des-comores-pour-le-renforcement-de-la-resilience-au-changement>

²⁶⁶ EIB projects investing in the sugar industry in Mauritius, <https://www.eib.org/en/infocentre/stories/all/2015-december-03/a-sweet-story-about-sugar.htm>

²⁶⁷ Ridge to Reef (see Table)

Evidence was found of development projects promoting the development of Mauritius' low-carbon economy. The project helped finance renewable energy and energy efficiency projects by supporting local banks in offering favourable conditions on green credit.²⁶⁸

Implementation of the EPA in **Seychelles** has been supported by development cooperation projects. This includes support for upgrading the agriculture and fisheries sectors to use more environmentally friendly production techniques. (In addition to development cooperation projects, EUR 2.8 million of the EUR 5.3 million that Seychelles receives each year under the Sustainable Fisheries Partnership Agreement is reserved for promotion of sustainable management of fisheries and support for small-scale fisheries).²⁶⁹

Infrastructure development in Seychelles with potential environmental impact has been supported by EU development cooperation. A major project to renovate and expand the commercial port in Port Victoria has been undertaken, which it is claimed will make handling of goods more environmentally sound. The project has involved extending the port yard area and dredging.²⁷⁰ A series of projects has supported the installation of a submarine fibre optic cable to improve the international connectivity of Seychelles.

The development cooperation projects with environmental impact found for **Zimbabwe** focussed primarily on aiding the development of the agricultural sector to introduce practices that are more environmentally friendly.²⁷¹ This included a project supporting the implementation of the EPA by strengthening the agricultural sector for international trade, particularly regarding phytosanitary standards.

A project was also found supporting natural resource management and wildlife protection through empowering communities to build livelihoods from their natural resources.

Table 106: Examples of EU development cooperation projects in the ESA countries

Programme	Description and comments
Comoros	
Support programme for the Union of Comoros to strengthen its resilience to climate change (AMCC) 3 Million EUR 10 th EDF	Contribute to building resilience to climate change.
ACP-EU Energy Facility 2,3 Million EUR 10 th EDF	Contribute to the installation of 6 photovoltaic electrical grids in rural areas of the island of Moheli.
Madagascar	
<i>Co-production de services publics de l'eau et de l'assainissement par les organisations d'usagers et les autorités communales</i> 400,000 EUR 10 th EDF	Contribute to the development of public water utility and cleaning water in rural areas (Analamanga region).
Ecofish 28 million EUR 11 th EDF	Project promoting sustainable fisheries and fishing, including monitoring and prevention of illegal fishing activity (building on Smartfish) ²⁷² .

²⁶⁸ <https://www.sunref.org/en/projet/recuperer-des-residus-sucriers-pour-les-valoriser-en-produits-industriels-a-forte-valeur-ajoutee/>

²⁶⁹ https://knowledge4policy.ec.europa.eu/publication/eu-sustainable-fisheries-partnership-agreements_en

²⁷⁰ <https://www.eib.org/en/projects/pipelines/all/20080432>

²⁷¹ https://ec.europa.eu/international-partnerships/system/files/c-2017-4418-annexe_en.pdf

²⁷² <https://www.commissionoceanindien.org/portfolio-items/ecofish/?portfolioCats=27>

Programme	Description and comments
RINDRA 40 Million EUR 11 th EDF	Rural development programme encouraging climate resilient and sustainable agriculture ²⁷³
AFAFI 80 Million EUR 11 th EDF	Rural development programme encouraging climate resilient and sustainable agriculture ²⁷⁴
Implementation of the interim EPA support project (SANTATRA)	Directly targeted at aiding the implementation of the EPA, one of the tasks involves improving knowledge of fishing workers of phytosanitary practices.
Mauritius	
Mauritius from Ridge to Reef 4 Million EUR GCCA+	Increase the native forest cover (including mangroves) to enhance the climate resilience of natural ecosystem and carbon sequestration
Renewable Energy and small island states 8 million EUR EIB	Aid in processing of molasses into ethanol to be used as a form of renewable energy, along with CO2 capture to be used by the food industry
Carbon burn-out facility 8 million EUR EIB	Conversion of coal fly and bottom ashes into additives for Portland cement, aiding the problem of waste management for ash disposal in Mauritius
Climate smart agriculture for small holders in Mauritius 6 million EUR GCCA+	Support for the capacity for the ministry of agro-industry and food security to offer advice on climate smart agriculture to producers, and support for adoption by producers of climate smart agriculture measures ²⁷⁵
Seychelles	
Supporting implementation of the Seychelles National Climate Change Strategy 3 million EUR GCCA+	Aims to strengthen the climate change sector policy framework and support adaptation to climate change in coastal areas ²⁷⁶
Port Victoria Rehabilitation 18 million EIB	Rehabilitation and expansion of the commercial port at Port Victoria including extension of the port yard and dredging. Dredging is associated with negative environmental impacts. ²⁷⁷
Zimbabwe	
Zimbabwe Agricultural Growth Programme (ZAGP) 42 Million EUR	Aims to help develop the diversification and efficiency of agriculture while promoting inclusive green economic growth ²⁷⁸

Source: Own compilation from EC and governmental sources

²⁷³ <http://www.midi-madagasikara.mg/economie/2020/03/21/programme-rindra-40-millions-deuros-pour-un-appui-institutionnel/>

²⁷⁴ <https://madagascar.cirad.fr/actualites/lancement-du-programme-afafi-sud-appui-au-financement-de-l-agriculture-et-aux-filières-inclusives>

²⁷⁵ <https://www.gcca.eu/programmes/climate-smart-agriculture-small-holders-mauritius>

²⁷⁶ <https://www.gcca.eu/programmes/continuing-supporting-implementation-seychelles-national-climate-change-strategy>

²⁷⁷ <https://www.eib.org/en/projects/pipelines/all/20080432>

²⁷⁸ https://ec.europa.eu/international-partnerships/system/files/c-2017-4418-annexe_en.pdf

Annex XI (Chapter 11): Development cooperation – Country Specific Programmes

Box 1: A general assessment of the 11th EDF

To start with **relevance**, the European Commission (2017) judges that the EDF programming was relevant, as it responded to the recipient countries' needs. Poverty reduction, the SDGs and aid effectiveness were aimed at. Herrero et al. (2015) see the concentration on low-income countries (LICs) and least developed countries (LDCs) positive and add that the so-called policy-to-practice gap has been reduced under the changes governance of the 11th EDF. With respect to **effectiveness**, Herrero et al. (2015) assess the sector concentration policy as successful. The European Commission (2017) argues that it is principally high, the goals are mostly achieved. However, this depends on the ACP countries willingness and ability to pursue institutional reforms. In addition, Herrero et al. (2015) argue that effectiveness is potentially reduced by a long programming process, the top-down approach of the EDFs in principle, and a relative low connection between joint programming and EU bilateral programmes. This aspect is directly connected to a central theme of the EU-ESA5 partnership, namely **governance**. The European Commission (2017) sees potential for institutional reform. **Efficiency** of development assistance is very difficult to measure. Neither of the studies uses an econometric model to test for the efficiency. The European Commission sees improvements as compared to elder EDFs but identifies a weakness related to the position of the NAOs as well as a potential problem related to what is labelled as a "one-size-fits-all"-approach of the EDFs.²⁷⁹ It cannot be said clearly whether this problem is relevant for the EU-ESA5 partnership.²⁸⁰

Table 107 is based on a careful study of all available material provided by DG Trade. It proves impossible for the Team to assess every individual programme without a doubt. This holds with respect to both its overall impact and the other individual criteria respectively. Nevertheless, the analysis provides a general assessment of the trade-related development assistance to ESA5, which can be found in the main text.

²⁷⁹ This critique resonates also with the general discussion about aid effectiveness; see e.g. Easterly (2007).

²⁸⁰ The European Parliament has long argued for an inclusion of the EDF's budget into the general EU-budget. Consequently, the EPRS (2014) argues that the double structure has high efficiency costs of 800million EUR per annum. This figure is not substantiated with a model. We will not pick up this discussion in the assessment.

Table 107: Country Specific Programmes within and outside the EDFs*

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
Comoros								
Programme ACP-EU TradeCom II, 6 Million EUR, see p037 Rapport de Demarrage Fin Bkp doc	The objective of the project was twofold: (i) bring Comoros' law and practice in line with trade commitments resulting from WTO accession and (ii) develop measures to incorporate the provisions of the regional EPA into the law and practice of Comoros.	This programme contributes to the development of trade between Comoros and the EU, which fits with the main objective of the interim EPA.		Efficiency is limited due to the country's human, financial and institutional resources	<p>* Legal reforms have been drafted, and legislative action plans to be in conformity with WTA agreements have been elaborated.</p> <p>* A system of exemption from customs duties and taxes is put in place.</p> <p>* A domestic taxation system is elaborated.</p> <p>* Adjustment measures (e.g., tariff and regulatory adjustment measures) are evaluated.</p> <p>*A programme for adapting to asymmetrical trade opening with the EU is drawn up.</p>	This complemented other ongoing negotiation processes such as WTO, EPA and AfCFTA		Positive.

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
MDG Initiative programme, 4,5 Million EUR, see DEVCO Country Fiche Comoros doc	Contribute to the drinking water supply of the Domoni agglomeration.	High – it addresses SDG 6 regarding availability and sustainable management of water				It forms part of the 10th EDF	Delegation agreement with Agence Française de Développement (AFD)	Potentially positive
Support programme for the Union of Comoros to strengthen its resilience to climate change (AMCC), 3 Million EUR, see DEVCO Country Fiche Comoros doc	Contribute to building resilience to climate change.	High – it addresses SDG 13 in terms of strengthening resilience and adaptive capacity to climate	The fragile economic environment represents a risk as regards the achievement of this objective			It forms part of the 10th EDF		Positive
ACP-EU Energy Facility, 2,3 Million EUR, see DEVCO Country Fiche Comoros doc (part of 10th EDF)	Contribute to the installation of 6 photovoltaic electrical grids in rural areas of the island of Mohéli.	High – it addresses SDG 7 by enhancing share of and access to renewable energy				This project is innovative and unique as the solar power systems on Mohéli Island are the first to be established in the country.		Positive.
Cooperation Support Programme (PAC), 4,25 Million EUR, see DEVCO Country Fiche Comoros doc	Support capacities of the National Authorising Officer and other stakeholders of the development cooperation between Comoros and the EU.	Very high, as it effectively addresses the interim EPA's ultimate objective of developing cooperation between Comoros and EU	Potential for higher effectiveness, as it takes stock of past experience for the formulation of the new programmes	Political difficulties have halted implementation / formulation progress	Measure to strengthen governance	It forms part of the 11th EDF	It complements stakeholders' ongoing cooperation developments between the Comoros and the EU	Positive, but dependent on governance reforms

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
Financial governance support programme, 3 Million EUR, see DEVCO Country Fiche Comoros doc	Contribute to improved public finance management and more efficient and transparent management.	High – trade liberalisation implies tariff revenue losses. A modern tax regime is necessary to compensate this loss.	High expectations in terms of revenue, financial training and budget programming		Measure to strengthen governance	It forms part of the 11th EDF		Potentially positive
Technical and Vocation Education and Training (TVET), 9 Million EUR, see DEVCO Country Fiche Comoros doc	Strengthen human capital to address the needs of the Comorian labour market in key sectors with high sustainable growth and job creation potentials	High – in line with SDG 8 by trying to decreasing unemployment and triggering economic growth and job creation	High expectations, since selected TVET institutions are strengthened to better respond to the labour market demands			It forms part of the 11th EDF	Participation of private sector in TVET is strengthened	Potentially positive, but weak governance endangers success
Madagascar								
10th EDF, 303,61 Million EUR, see DEVCO Country Fiche Madagascar doc	Contribute to various reforms and national strategies in different areas. Under the 10th EDF (2007-2013) Madagascar benefits from regional projects aiming at the implementation of the regional fisheries strategy (Smartfish), maritime security (MASE II) and regional integration (RISP III).		Tangible results and impact of the projects/ programmes under 10 th EDF: *Social sectors: For example, the EU has financed the salaries of contract teachers and has financed school canteens benefitting 219,000 pupils and teachers in food-insecure areas, as well as school kits for 3,800,000 primary pupils		The EU is aiming to contribute to a more stable political environment with better governance, less corruption and stronger institutions, especially after the inclusive and transparent elections held in 2018/2019. EU engagement is focusing on improving government accountability, public policies and the capacity of civil			Positive.

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
	<p>The country also benefited from different ACP funds including: the EU Water Facility (ended in 2012) and the EU Energy Facility (17 Million EUR, projects still being implemented). 6 water projects are being implemented under the MDG line (10 Million EUR). Madagascar has also benefitted from Intra-ACP programmes with a continental scope (EDES and PIP for agricultural products) that could be continued under the "Fit for Market" programme.</p>		<p>during the 2013/2014 school year.</p> <p><u>*Agriculture/food security</u>: EU's support aims at reducing food insecurity by enhancing food self-sufficiency and by increasing rural income. It is benefitting more than 100,000 households (representing +/- 600,000 people). The EU contributes also to the international response to the locust invasion.</p> <p><u>Infrastructure rehabilitation</u>: the EU's support targets the South East region and funds rehabilitation works of key national roads and connected feeder roads. The use of labour intensive methods allows injecting direct revenues to the populations (estimated 18,000</p>		<p>society to perform their role</p>			

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
			<p>households). Given the vulnerability of the country to climate-related events, the EU's support is also addressing post-cyclonic reconstruction.</p> <p><u>Millennium Development Goals (MDGs)</u>: the EU is acting in the area of nutrition and in the field of water supply and sanitation: in 50 rural communities' access rates to safe drinking water is expected to increase from 25% to 65%, and to sanitation by 10%.</p> <p><u>*Governance</u>: The EU also contributed to the 2013 presidential and legislative elections (both EDF and IfS funding).</p>					
Development of employment and regional integration support programme (PROCOM), 8 Million EUR, see D-	Contribute to the development of a panel of services to businesses and defend the interest	High – relates to SDG 8 regarding job creation	Efforts have been made to adjust and address operational problems	The conclusion was that this project has been valuable and pertinent although some important weaknesses in the		With regard to the activity of professional training foreseen in the project, PROCOM had no added value	Support from Agence Française de Développement (AFD)	Positive.

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
24441 Consolidated ROM report 20200115 doc (part of 10 th EDF)	of the private sector in public-private dialogue.			conception were detected, notably as concerns the appreciation of the financial and human resource capacities of the implementing institutions and beneficiaries which lead to serious implementation problems (see DEVCO Country Fiche Madagascar doc).		compared to other partners.		
<i>“Co-production de services publics de l'eau et de l'assainissement par les organisations d'usagers et les autorités communales”</i> , 400.000 EUR, see DEVCO Country Fiche Madagascar doc (part of 10 th EDF)	Contribute to the development of public water utility and access to clean water in rural areas (Analamanga region).	High – in line with SDG 6 in terms of development of water access and cleanliness		The conclusion was that the implementation was efficient and it had reached the results (see DEVCO Country Fiche Madagascar doc).		It also focused on the essential questions of sustainability and appropriation of end-users and the financial commitment of municipalities		Positive.
Regional integration export development support programme (PADEIR), 10 Million EUR, see GJC MADA doc (part of 10 th EDF)	Contribute to economic development, economic exchanges with the EU, and the development of the private sector. The aim of the	Very high - This project is directly linked to the interim EPA.		High - Technical assistance ensured overall coordination of all these activities, along with the management of the related	It aims to improve national control infrastructure and the export process	Complements the interim EPA's objectives by aiming to enhance Madagascar's export capacity and improve access to EU markets		Potentially positive

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
	programme is to help Madagascar benefit from the EPA.			programme estimates				
11th EDF, 563,5 Million EUR, see DEVCO Country Fiche Madagascar doc	<p>Contribute to various reforms and national strategies in different areas.</p> <p>Under 11th EDF (2014-2020), Madagascar benefits from RIP funds for an infrastructure project (EIB Road infrastructure, blending 31 Million EUR, SADC RIP) and a support programme for EPA implementation (PADEIR, 10 Million EUR, SADC RIP).</p> <p>The 11th EDF also continues support to the implementation of a sustainable regional fisheries economy « EcoFish » 28 Million EUR, RIP IOC (building on Smartfish).</p>	High	Economic developments have remained favourable, however political instability might restrict effectiveness		The president has stated his ambition to put Madagascar on a sustainable development path and after the first year in government	The EU will help support the country in drawing the benefits from the EPA. Joint governance has also been initiated for the next programming period	The EU coordinates with all partners, including the World Bank, African Development Bank, IMF, JICA, USAID, the UN (UNDP, WFP, FAO, UNICEF, ONUDI, FIDA, UNFPA), as well as NGOs, and interacts with the private sector and with the civil society.	Positive
Regional Integration Support Mechanism	Encourage Madagascar to lift its tariff and non-					It complements interim EPA efforts by encouraging	Madagascar could benefit from other sub-envelops still to	Potentially positive

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
(RISM), see GJC MADA doc (part of 11 th EDF)	tariff barriers to trade in order to facilitate exports and regional integration in favour of the private sector.					Madagascar to lift its tariff and non-tariff barriers to trade in order to facilitate exports and regional integration	be defined such as Wildlife conservation, Food Security and Trade-related components through SADC and COMESA, in which the EU participates	
RINDRA, 40 Million EUR, see DEVCO Country Fiche Madagascar doc (part of 11 th EDF)	Rural development programme. Contribute to improving the producers' environment to allow investments in terms of safety.	High – attempts to develop rural areas in terms of production					With Agence Française de Développement (AFD)	?
AFAFI, 50M EUR (north), 30M EUR (south), 12M EUR (centre), see DEVCO Country Fiche Madagascar doc (part of 11 th EDF)	Rural development programme. Contribute to improving the agricultural sector (access to training, access to credit, internal organisation) to increase the competitiveness of the sector.	High – it aims to reduce poverty parallel to developing sustainable agricultural development		Limited efficiency potential due to poor governance				?
Implementation of the interim EPA support project (SANTARA), see 388955 - Rapport narratif - DP1 Santara doc	Contribute to sustainable and inclusive development and the fight against poverty, including by reinforcing Madagascar's	The project is directly linked to the interim EPA. The main targets of the project are private operators in the textile and fisheries sectors, and	Competitiveness of free zones and the fishing industry is improved. The capacity of the relevant ministries is strengthened.			Contributes to the greater objectives of the interim EPA by increasing regional and international trade parallel to creating a		Positive

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
	regional and international position.	ministry staff (e.g., ministries of industry, private sector development and, customs).				favourable business environment		
Mauritius								
Mauritius EPA support project for improving the business and investment climate, 12 Million EUR, see X-REG REI EPA implementation Mauritius	To review the licensing framework, to eliminate inefficiencies and put in place a comprehensive framework encompassing aspects of Intellectual Property	High – it is an EPA support project and contributes primarily to the progressive achievement of SDGs 8 and 9			Approach advocated under this project for ambitious and broad reforms in regulatory framework had the potential to provide early results and generate political support for broader and systematic reforms.	It is expected to trigger innovation	It complements the initiatives undertaken at the levels of COMESA and the Southern Africa Development Community (SADC). COMESA RISM and the World Bank also provided assistance	Positive
Vision 2030, see DEVCO Country Fiche Mauritius	To join the league of high-income countries before 2030 by fully exploiting its resources, political stability, and strategic location between Africa and Asia	High – it is the successor of the 11th EDF programme and aids Mauritius in meeting its developmental priorities	High - the EPA Implementation Plan was aligned with this policy documents and extensively consulted with the stakeholders					Positive
AAP 2018 Support Mauritius, 7.9 Million EUR, see DEVCO Country Fiche Mauritius	Increasing employability and support growth and the transition of Mauritius to a high-income country	High (long-term) – it covers development and youth employability through post-secondary education,	It has the potential to be effective in the long-term	Low – the budget will now be spent on recovery from Covid-19		It aims to trigger innovation as a development measure	It complements interim EPA aims with its development initiatives	Positive

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
	through innovation and increased competitiveness. (CANCELLED AND REPLACED BY HEALTH (COVID-19 RESPONSE) BUDGET SUPPORT PROGRAM)	training and innovation initiatives						
Mauritius from Ridge to Reef, 4 Million EUR, see DEVCO Country Fiche Mauritius	Increase the native forest cover (including mangroves) to enhance the climate resilience of natural ecosystem and carbon sequestration	High – It aims to increase the native forest cover (including mangroves) to enhance the climate resilience of natural eco- system and carbon sequestration.	High - it will enhance resilience to climate change			Ridge to Reef had already been mentioned in the UN report, however this project extends the analysis	It complements Mauritius' UN report regarding coastal development of ecosystems	Positive
Sugar Industry Reform Project, 28 Million EUR, see DEVCO Country Fiche Mauritius	Construction of sugar refineries as well as improvements to the sugar storage and handling facilities.	High (long-term) - supports the reform of the EU sugar market policy by assisting to improve Mauritius' international competitiveness. It also supports private industrial investment	High – the projects were implemented successfully and were fully aligned with the Multi-annual adaptation strategy			It was the first EIB funded project linked to one of the national adaptation strategies for the Sugar Protocol countries	Fund was provided by EIB to two private sector operators in the sugar sector (Omnican and Alteo)	Potentially positive
Sugar Diversification Project, 8 Million EUR, see DEVCO Country Fiche Mauritius	Fostering the country's economic and social development and contributing to	High – it aims to foster the country's economic and social development and contributing to				It involved the construction of an airport hotel in Mauritius and associated infrastructure to	EIB approved and signed the financing with Omnicane	Positive

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
	sustainable long-term development.	sustainable long-term development				diversify sugar production		
Renewable Energy and small island states, 8 Million EUR, see DEVCO Country Fiche Mauritius	To further develop their integrated estate in order to increase the value addition of the cane industry	High – it aimed to increase the value addition of the cane industry by processing the molasses into ethanol (renewable energy)	High – project was successfully implemented and followed by the installation and operation of a carbon burn-out facility			The follow-up project is an innovative waste management project addressing the problem of ash disposal	EIB signed an EUR 8M facility with Omnicane	Positive
Youth Employment Programme, additional 5.7 Million EUR in 2014, see Mauritius GJC 2nd Submission	<u>To</u> enable unemployed youth to obtain training/placement for an initial period of one year, with the possibility of permanent employment thereafter; To ensure appropriate training is provided to youth to promote the development of necessary skills in the labour force; To assist employers in obtaining appropriate skilled manpower.	High (long-term) - It addresses youth unemployment for those below 30 by building capacity and Promoting employable skills among the youth, whereby the youth are placed in organisations to enable them to acquire on the job training	High – the sectors involved have benefitted from the YEP Programme and around 60 % of those trained under the YEP have resulted into job creation as permanent employment	High	The Government in collaboration with the private sector set up a Dual Training Programme (DTP), which aims at providing academic as well as on the job training to students	The issue of skills mismatch from academia is addressed through the programme focusing on the development of an industry-based curriculum by the industry	It is a joint Public-Private initiative, run by the Skills Working Group (SWG), operates under the aegis of the Ministry of Finance and Economic Development (MOFED)	Positive
Promoting sustainable and Equitable development, 78 Million EUR, see Mauritius GJC 2nd Submission	To promote sustainable and equitable development	High	High - Strong government intervention		A pragmatic set of liberalisation and diversification policies from the government			Potentially positive

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
Improving competitiveness and Equitable development, 278/42 Million EUR, see Mauritius GJC 2nd Submission	To ensure the commercial viability and sustainability of the sugar sector so it can continue fulfilling its role in the Mauritian economy	High	High - Strong government intervention		A pragmatic set of liberalisation and diversification policies from the government			Potentially positive
Support to Tertiary Education, Research and Innovation, 7.9 Million EUR, see Mauritius GJC 2nd Submission	Contribute to further growth, promote trade and investment between Mauritius and EU. Link whenever possible to investment opportunities within a broader Africa region.	High				Only the title is provided, however it suggests a high level of innovation		Potentially positive
Technical Cooperation Facility, 2.2 Million EUR, see Mauritius GJC 2nd Submission	To support the process for Vision 2030 which aims at transforming Mauritius into a High Income Country	High – covers SDGs 5 and 10; gender equality and reduced inequality						Positive
Smart Innovation through research in Agriculture (DeSIRA), 3 Million EUR, see Mauritius GJC 2nd Submission	To promote a well-reasoned mode of production which will allow the general agriculture in Mauritius, to move towards more sustainable and resilient systems in the face of climate change	Very high – agriculture is one of the top aspects of the interim EPA	Improved effectiveness of public policies			Intends to use technology development to tackle climate change		Potentially positive

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
SunRef III – Green loan line of credit to private sector for development of renewable energy, 7 Million EUR, see Mauritius GJC 2nd Submission	To develop green energies and sustainable resource management	High – it promotes the development of a low carbon economy in the region by financing the development of renewable energy and energy efficiency solutions					EU supports the EU-Africa ITF and Agence Française de Développement (AFD) supports local banks in allocating green credit in favourable conditions (low interest rates, long tenor, grace period) for tailored made debt	Potentially positive
Fisheries Partnership Agreement, 2.3 Million EUR, see Mauritius GJC 2nd Submission	The development of the fisheries sector and the maritime policy and ocean economy	Note: not sure whether to include, however there was a country-specific article						Potentially positive
Improvement of the Business and Investment climate, 10 Million EUR, see Mauritius GJC 2nd Submission	Improving the business and investment climate	High – the implementation of regulatory reforms would enable to create a more enabling business environment with greater transparency that would attract private sector investment				It aims to establish an effective partnership between the public and the private sector is key to unleash the potential for economic diversification		Potentially positive
Trade Facilitation and Trade Promotion and Development, 1.4 Million EUR, see Mauritius GJC 2nd Submission	To unlock the trade potential of SMEs along the value chain, assisting them to climb the value chain through value addition and ensuring quality	High – the EU provided support to facilitate international trade and help to enhance the capacity of the Mauritius Customs				It involves implementing a risk management framework, setting up non-intrusive inspection technologies,		Potentially positive

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
	throughout production and manufacturing processes	in the delivery of its services				capacity building on investigative and surveillance techniques to strengthen risk management system		
Seychelles								
11th EDF Programme in support of Seychelles implementation of the current EPA, 10 Million EUR, see GJC Seychelles	To improve the efficiency, ownership and capacity of actors to manage the current EPA agreements; Support value chains upgrading in the agriculture and fisheries sectors and job creation, including through using environmentally friendly production techniques; Improve trade facilitation and trade and investment promotion	High – it aims to implement risk management framework, setting up non-intrusive inspection technologies, capacity building on investigative and surveillance techniques to strengthen risk management system	Expected results are positive		The government became very interested in deepening of the current EPA in the areas of trade in services, RoO, technical barriers to trade, sanitary and phytosanitary measures and dispute settlement, and move to a 'full' EPA' within the current EPA group	One of the priority activities under the programme was to identify high value products with export potential, thereby identifying new export categories		Potentially positive
SME scheme, 116,125 EUR, see GJC Seychelles	Medium (long-term) – it will support the Seychelles with loans, with the Development Bank of Seychelles managing funds for fisheries and agriculture	Medium	In addition to difficulties in accessing credit, other pressing shortcomings are an inadequately skilled labour force and government bureaucracy			Improving access to finance will help unleashing the productive and innovative capacity of the private sector	Initiated by the Ministry of Trade, Finance and Investment, in partnership with several commercial banks such as the Development Bank of Seychelles, supplemented by	Potentially positive

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
							co-funding from the European Investment Bank	
11th EDF COMESA sub-envelope Objective 2, 10 Million EUR, see GJC Seychelles	Increasing private sector participation in regional / global value chains through improved business climate, enhanced competitiveness and productive and innovation capacity	High – it aims to improve business environment						Potentially positive
Technical Cooperation Facility (TCF), 2.2 Million EUR, see DEVCO country fiches Seychelles	Respond to institutional capacity constraints	Medium – it aims to support institutional capacity development		Low – following the implementation of the National Sustainable development strategy might not be optimal when considering the limited human capacity in the country			Budget allocation provided by the 11th EDF programming	?
Seychelles Submarine Cable Project, 27 Million EUR, see DEVCO country fiches Seychelles	Installation and operation of the first submarine fibre optic cable for the international connections of the Seychelles		The project was satisfactorily completed in 2015 by SCS			It entailed the installation and operation of the first submarine fibre optic cable for the international connections of the Seychelles	The total cost of the project was EUR 27M financed by an EIB loan of EUR 8M and an ADB loan of EUR 8M. The remaining gap was covered by equity from the private telecom operations and the	Positive

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
							Government of Seychelles	
Seychelles Submarine Cable Project II, 20 Million EUR, see DEVCO country fiches Seychelles	To strengthen diversity and resilience within the country's telecommunications infrastructure through the installation and operation of a second submarine fibre optic cable for the international connection of Seychelles	Low – to deliver more international bandwidth and capacity for Seychelles and to strengthen diversity and resilience within the country's telecommunications infrastructure				It is a follow-up of the first submarine fibre optic cable	The project cost is EUR 20m and the EIB would give a loan of EUR 8M, to the promoter Seychelles Cable System Company Ltd (SCS) with SCS covering the gap using its own funds	?
DBS Private Sector Facility, 10 Million EUR, see DEVCO country fiches Seychelles	To finance loans to small-and medium-sized enterprises in Seychelles, through the intermediary Development Bank of Seychelles (DBS)	Medium (long-term)				This new line of credit is a follow-up to previous lines of credit to DBS, successfully utilised for the financing of SMEs in Seychelles	The finance contract is currently being negotiated with Development Bank of Seychelles	Potentially positive
Port Victoria Rehabilitation, 35 Million EUR, see DEVCO country fiches Seychelles	The rehabilitation and expansion of the Commercial Port within Port Victoria	Very high - project will allow for secure, safe and environmentally sound handling of goods, improve efficiency of port operations and nautical access and increase the overall port capacity by providing more berth length and yard area	In progress, however seems effective – involves a detailed design and construction of a new quay offset from the existing quay, demolition as necessary of the existing quay, extension of the port yard area and dredging				The promoter of the project - and borrower - is Seychelles Port Authority (SPA) a 100% public entity. It is being co-financed by the EIB (EUR 12,5m loan), the EU (EUR 5m grant) and the AFD (EUR 16,5m loan)	Potentially positive

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
Seychelles Water & Sanitation, 54 Million EUR, see DEVCO country fiches Seychelles	The renewal and expansion of water supply systems in the 3 main islands of Seychelles to cover the current and projected water deficits and resilience to climate change.	High – involves the upgrading of the existing sewerage system in Mahé island and creation of new sanitation facilities in La Digue to reduce risk of contamination of the groundwater sources used for the production of potable water	High - The project was said to be fully and satisfactorily implemented - although with some delays - by end 2019				Promoter is the Public Utilities Corporation (PUC). The project cost amounts to EUR 54m and has been financed by the EIB (EUR 27m loan), the AFD (10m EUR), an EU grant (EUR 2,4m) and contributions from the Government of Seychelles	Potentially positive
DBS Global Loan, 5 Million EUR, see DEVCO country fiches Seychelles	Financing of small and medium-scale projects carried out by SMEs	Medium (long-term)					EIB allocated EUR 5 million-loan project, co-financed and intermediated by the Development Bank of the Seychelles	Potentially positive
Zimbabwe								
Support to trade and private sector development project (TPSDP), 3 Million EUR, see Zimbabwe TPSDP oc	Contribute to the economic recovery, the economic diversification and poverty reduction in Zimbabwe.	Average; consistent with the national strategies for trade and private sector development, poorly designed projects interventions	Average; consistent with the national strategies for trade and private sector development, but institutional capacity building is poor	Satisfactory; funding in line with beneficiaries' capacity and ability, project management appreciated, expenses often well optimised	So far, Zimbabwe has benefitted of regional projects including several countries but no specific projects for the country		DANIDA Partnership Programme was introduced, DFID and the World Bank have launched business environment programmes	Negative - The overall impact of the project is poor; average implementation rate of 39%, with the project yet to delivery real impact
Zimbabwe Agricultural Growth Programme (ZAGP), 42 Million	Contribute to the development of a diversified and efficient agriculture sector that promotes inclusive	High – it addresses climate change adaptation, aid to environment and gender equality	High – Improved agricultural education systems, better access to market and increased	Environment for doing business and support the agro-processors was improved along with	The World Bank multi-donor fund, ZIMREF, will initiate a reform	FAO is starting an EDF-funded programme focused on policy and coordination		Positive

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
EUR, see ZAGP Action doc	green economic growth.		production & investment	improved infrastructure and policies	programme. The project will work to establish baseline information and performance management systems for parastatals	technical support, which will address various aspects of the ZAGP		
Strengthening the national Sanitary and Phytosanitary institutional framework in Zimbabwe (SPS), 855,000 EUR, see Final Narrative Report SPS	Contribute to the increase of Zimbabwe international trade of agricultural goods, based on i-EPA implementation	High - essential equipment was upgraded and the knowledge of beneficiaries regarding Sanitary and Phyto- sanitary standards and their monitoring improved	High - SPS institutional capacities and knowledge among beneficiaries has substantially improved and the project entirely fulfilled its objectives	High - the project steering committee ensured a smooth implementation of the project to meet priority needs	Government provided budget allocation for extension services for farmer training regarding knowledge and improved agricultural practices			Positive - The project benefitted from the support of the Standards Association of Zimbabwe (SAZ), which helped in the elaboration of the Standard on Good Agricultural Practices for horticulture
Regional integration implementation project, 1,764,345 EUR, see 20130212 ZIMBABWE RIIP PROJECT doc	Contribute towards regional integration to improve the incomes from trading with other nations and ultimately contribute towards the improvement of the welfare of the citizens of Zimbabwe	High – it tackles the inadequate understanding of the regional integration agenda and EPA issues by stakeholders					The overall objective of this project is consistent with the COMESA Programmes	Potentially positive
Zimbabwe EPA Support Project, 7,222,222 EUR, see X-REG REI EPA implementation	Enhance Zimbabwe's integration into the regional	Very high – the overall objective of the project is in line with the EPA and its objectives,			Government of Zimbabwe was engaged with the IMF to implement an economic		Although there is no formal donor coordination, the Delegation organises regular	Potentially positive

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
Zimbabwe C 2016 —	and international trading system (2016)	including trade development. The project's successful implementation should also help Zimbabwe reap the benefits offered by the EPA			reform, support was to be focused on policy and regulatory reforms and capacity building		ad-hoc meetings to discuss and coordinate interventions with EU Member States and other donors on private sector development issues	
Zimbabwe Natural Resource Management Project, 12 Million EUR, see ZW- Jobs and Growth Compact – 22022018 doc	EU supports natural resource management and helps protecting wildlife, mitigate human -wildlife conflict, empowers communities and women to make a livelihood out of their natural resources and research to protect wildlife, flora and fauna	Only the name is presented in the document, however the title suggests a high relevance						?
Governance and Institution Building, 45 Million EUR, see ZW- Jobs and Growth Compact – 22022018	To strengthen the rule of law through institutional capacity building. This support is designed to foster good governance including public finance management, accountability and transparency in order to contribute to Zimbabwe's economic recovery,	Only the name is presented in the document						?

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Added value	Complementarity and Leverage	Impact
	and to the consolidation of the constitutional and democratic processes, as well as to peace and stability							

* Note: The information in the tables below has partially been copied from its respective sources.

Annex XII (Chapter 11): Development Assistance Programmes

An assessment of a policy's impact would in general be methodologically solid, if it was based on a combination of econometric analysis and case studies. Econometric analyses are only possible on a somewhat higher aggregation level, as one needs a sufficiently large sample to achieve significant results. Nevertheless, it may be interesting for the reader to get acquainted with the vast body of literature on aid effectiveness, which can be found on Martin Paldam's website: <http://www.martin.paldam.dk/Meta-AEL.php>. Since we want to understand the effects of individual programmes, we would rather focus on the second method.

This is of course beyond our means, except for the fact that much of the assessment presented in the Tables below are based on studies by the European Commission or consultants, which may be interpreted as case studies. If the studies are done by the European Commission, they follow a certain script. This is appreciated, as studies conducted by the same agency that is conducting the policy face the risk to be slightly biased towards a positive judgement. The less discretion in the way to report the assessment the authors have, the less this risk is, although it never can be completely excluded.

Table 108 entitled "**Regional Programmes within and outside the EDFs**" is an attempt to give a comprehensive overview of the regional programs set up by the EU to support the ESA5 countries in a broad way on their path to implement and harness the interim EPA.

Table 108: Regional Programmes within and outside the EDFs*

Programme	Objective	Relevance	Effectiveness	Efficiency	Governance	Complementarity and Leverage	Added value	Impact
Regional Programmes COMESA								
Regional Enterprise Competitiveness and Access to markets Programme (RECAMP), 10 million EUR, 11 th EDF; see Action Document 2018	Contribute to increased private sector participation in regional and global value chains	High: SDG 8 and 9, in addition SDG 5; SMEs	Potentially high	Aims at the private sector, leads to efficiency gains	Depending on political commitment in COMESA countries	Synergies sought with other donors' programs as well as with other EU programs	Depending on regional coordination efforts	Potentially positive
Small-Scale cross Border Trade Programme, 15 million EUR, see Action Document 2017	Formalisation of informal cross-border trade; reduction of corruption	High, social and gender aspects covered	high	Small-scale trades normally pay more than large trades, cost reduction achieved	Consistent with COMESA policies on trade regimes, customs clearance, gender; nevertheless weak governance as risk	Consistent with 2007 EU Aid for Trade strategy; synergies with World Bank Charter for Cross-Border-Traders and TFP		Potentially highly positive
Trade facilitation programme (TFP), EDF, 53 million EUR; see Action Document 2017	Increasing intra-regional trade of goods and services	High; supply-side constraints are fundamental in intra-regional trade	Depending on capacities in the COMESA Secretariat and members	Reduced trade distortion targeted	Depending on political commitment and capacity in COMESA countries, especially wrt services trade	Synergies sought with other donors' programs as well as with other EU programs. Moreover: 5 complementary	Donor coordination is a high priority	Potentially highly positive

						areas: NTBs; WTO compatible; border management; SPS; goods, services and persons.		
Regional Integration Support Programme (RISP 3), EDF, 7.4 Million EUR, see Imani 2016, COMESA Secretariat 2017	Contribute to deepened integration and competitiveness of the COMESA region	Support of regional integration is highly relevant.	High: COMESA internal market fastly implemented; business linkages increased		COMESA (Secretariat and members) has become more effective and efficient	Stakeholders' interests considered		Positive
Regional Integration Support Mechanism (RISM), EDF, 78 Million EUR over 12 years, see 12 th Annual Report 2019	Consolidation; support the economic integration process of the Eastern, Southern Africa and the Indian Ocean region through the consolidation of the COMESA FTA and implementation of the COMESA and EAC Customs Unions and Common Markets;	Very high, 18 ambitious performance indicators	Potentially high	Potentially high	Setting-up of institutional and administrative structures			Positive, but moderate due to financial limitations

	12 work plans with multiple objectives							
Indian Ocean Commission								
Enhancing Entrepreneurship and Business Project, 8 million EUR, 11 th EDF	SDGs 4, 8, 9, 12, 17, concentrating on SMEs and enhancing their intra-regional trade	High	Potentially high due to involvement of local chambers of commerce	Potentially high due to involvement of local chambers of commerce	Improvement of IOC members' business regulatory environment	Consistent with new EU Gender Plan 2; involvement of African financial institutions in the dissemination of funds		Potentially positive, but moderate due to financial limitations
ECOFish, 29.4 million EUR (28 million EUR 11 th EDF), see Action Document 2018	Support sustainable management and development of fisheries in order to contribute to poverty alleviation, food and nutrition security, while addressing climate change resilience and enhancing marine biodiversity	High, focus on small scale fisheries	high		Improvement of governance, statistics and data, combatting IUU fishing	Compatible with Common fisheries Policy, EU Global Security Policy Strategy and other EU projects in the region; risk of overlapping efforts from several donors		Potentially positive
Smartfish, 37 million EUR, 10 th EDF, see FAO Fiche 2014 and Report 2018, IOC 2018 and	Regional fisheries Program, management, reduction of losses and recovery pathways for	High, direct access to fishers	high		Business management, hundreds of workshops with fishers	Fishers receive direct teaching		Positive, but problem of ownership according to IOC Secretariat

	overfished species							
Regional Integration Support Mechanism (RISM), 33.41 Million EUR over 12 years, see 12 th Annual Report 2019	Consolidation support the economic integration process of the Eastern, Southern Africa and the Indian Ocean region through the consolidation of the COMESA FTA and implementation of the COMESA and EAC Customs Unions and Common Markets; 12 work plans with multiple objectives	Very high, 18 ambitious performance indicators	Potentially high	Potentially high	Setting-up of institutional and administrative structures			Positive, but moderate due to financial limitations
Regional Integration Support Programme (RISP 3), 6.15 Million EUR, see RISP 3 Action Fiche 2013	Contribute to deepened integration and competitiveness of the IOC region	Support of regional integration is highly relevant.	Effective application of international standards sought		IOC (Secretariat and members) has become more effective and efficient	Stakeholders' interests considered		Positive
SADC								

Dialogue Facility, 3 Million EUR, 2019-2022, see Action Document 2018 and EU-SADC Regional Cooperation Update, January-June 2020	Facilitate multi-stakeholder dialogue	Network building is relevant	Peer-to-peer is likely to be effective, but only if dialogues are not stand-alone events		Learning exchange and studies	Indirect benefits for CSO through consultative processes on key topics	Yes, through knowledge creation	Positive, but limited funds, delay due to Covid 19
Trade Facility Programme (TFP), 2019-2023, 15 Million EUR see Action Document 2018 and EU-SADC Regional Cooperation Update, January-June 2020	Strengthening capacities for simpler customs procedures and reduce NTBs/TBTs	Highly relevant	Improving understanding of NTBs and TBTs	Limited, depending on countries' ability to comply	Strengthening knowledge and governance	Coherent with many other initiatives, helps SMEs and informal traders	Yes, through knowledge creation and institution building	Positive
Regional Agriculture Policy (RAP), 201-2022, 9 Million EUR, see Action Document 2016 and EU-SADC Regional Cooperation Update, January-June 2020	Support of SADC RAP with knowledge creation	Highly relevant	Aims at stakeholders, e.g. farmers, CSO, women.		Strengthening knowledge and governance	Coherent with other support programs (EU, USAID, DFID), regional and national level; FAO is involved. However, program independent from EU-trade and agricultural policies	Yes, through knowledge creation	Positive
Support towards Industrialisation and the	Address key concern hindering	Relevant sectors	Probably effective, as focusing on two	Doubtful, as RVCs are partly set up according	Improved regulatory environment	Complementary to REIS, TRF and the Project	Focus on two sectors: regional anti-retroviral and	Positive

Productive Sectors (SIPS) in the SADC region, 2019-2024, 18 Million EUR, see Action Document 2018	industrialisation, focus on regional value Chains (RVCs)		industries, not trade-related.	to regional proportional representation.		Preparation and Development Facility (PPDF), GIZ as partner	leather value chains	
Eastern and Southern Africa Transport and Transit Facilitation Programme (TTFP), 2017-2023, 21.6 Million EUR, see EU-SADC Regional Cooperation Update, January-June 2020	Develop and implement harmonised road transport regulation and standards, directed at Tripartite member states, among them Mauritius and Zimbabwe	Infrastructure is a major bottleneck	Agreement concluded in the Tripartite in November 2018		Improved regulatory environment			Positive
Regional Economic Integration Support Programme (REIS), 2013-2016, 19.6 Mill. EUR, see Final Evaluation of REIS through Pinto and Pohl Consulting & Associates and Midterm Evaluation by Business and	Promote economic growth and reduce poverty in the SADC Region	High, except for the financial market	Medium effectiveness	Low efficiency	Institutional obstacles prove to be detrimental to success, SADC Secretariat is meant to become more visible and important for member states	Not fully complementary with TRF and PPDF.		Limited, both positive and negative

Strategies Europe.								
Support to improving the Investment and Business Environment in the SADC region (SIBE), 2019-2024 14 Million EUR, see Action Document 2018	3 key objectives: investment policy framework; integration of financial markets; financial inclusion for local businesses and SMEs	High, but presumably over-ambitious	Aims at SMEs and addresses gender issues		Strengthening knowledge and governance	Complementary to EU External investment Plan and to REIS, TRF and the Project Preparation and Development Facility (PPDF), World Bank and OECD are partners	Yes, through knowledge creation and institution building	Positive

* The sums indicated are available for all respective COMESA, SADC and IOC countries. In the framework of RISM, about 10 million EUR were reserved for ESA5 countries in sum.